



08/20/2026

Michael Williams  
Technibus, Inc.  
1501 Raff Rd. SW  
Canton, OH 44710

**RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE**

Facility ID: 1576051550  
Permit Number: P0140600  
Permit Type: Initial Installation  
County: Stark

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search | Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street Suite 700  
PO Box 1049  
Columbus, Ohio 43216-1049

and

Canton City Public Health Air Pollution Control  
420 Market Ave.  
Canton, OH 44702-1544

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Public Health Air Pollution Control at (330)489-3385.

Sincerely,

Robert Hodanbosi  
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification  
Canton; Pennsylvania; West Virginia

# PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation

Technibus, Inc.  
1501 RAFF ROAD SW  
Canton, OH 44710

ID#: P0140600

Date of Action: 08/20/2026

Permit Desc: Initial installation FEPTIO for a new miscellaneous metal parts Coating Spray Booth #5 (K009) with facility-wide synthetic minor restrictions for VOC, individual HAPs, and total combined HAPs to avoid Title V and Major MACT status at an existing FEPTIO facility.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit # in the "Search Projects" search box.

## Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

Technibus Inc. is an existing FEPTIO facility located in Canton Township, Stark County. Its operations are described by the NAICS code 335931, "Current-carrying wiring device manufacturing". Emissions units which the facility is currently authorized to operate are:

Permitted EUs:

K004 Liquid coating spray booth with a 1.65 mmBtu/hr natural gas heater

K006 Air gun liquid coating spray booth for miscellaneous metal parts, rated at 0.94 gal/hr of coating, with a make-up air heater

K007 Air gun coating spray booth for miscellaneous metal parts which are air dried, rated at 1.25 gal/hr of coating

K008 Coating spray booth for misc. metal parts, rated at 1.25 gal/hr, with a make-up air heater

Permit Exempt EUs:

B001 Permit-exempt 4.35 mmBtu/hr natural gas-fired heater

B002 Permit-exempt 2.2 mmBtu/hr natural gas-fired heater

K005 De minimis powder coating line

P001 Permit-exempt saw, router and milling machine line for machining polyester glass with baghouse

The facility is currently a synthetic minor source to avoid Title V and MACT applicability and operates under PTIO P0109326 for EU K004, FEPTIO P0127202 for EU K006 and K007, and FEPTIO P0134092 for EU K008.

This new FEPTIO permit is for the initial installation of a new liquid coating spray booth, EU K009, for coating miscellaneous metal parts. The booth metal parts are cleaned with a solution (parts cleaner) prior to coating. The coated parts are washed with a solvent-based thinner (cleanup material). The booth utilizes a 99.3% efficient dry filter for particulates from coating overspray. Process equipment includes a 2.71 MMBtu/hr natural-gas make-up air unit to provide heated air at less than 200 degrees Fahrenheit to reduce drying time.

EU K009 will be subject to the same facility-wide synthetic minor restrictions taken in FEPTIO P0134092, which have been included in this new FEPTIO P0140600, with some revisions, as described below in Section 4. The revised facility-wide synthetic minor restrictions will be included in the in-process FEPTIO renewal, P0131585, for EUs K004 and K006-K008.

3. Facility Emissions and Attainment Status:

Technibus Inc. is located in Stark County, which is designated as attainment for all National Ambient Air Quality Standards (NAAQS). The facility's permitting classification is FEPTIO. This facility emits PE/PM, OC/VOC and HAPs. PM emissions are controlled by the dry filters on each spray booth. Facility emissions are primarily volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions from the coating spray booths #1-5 (EUs K004, K006-K009) that include coating and cleaning materials. The following HAPs emitted by this facility are listed as Toxic Air Contaminants pursuant to OAC Rule 3745-114-01: Ethylbenzene, Methanol, Methyl isobutyl ketone (MIBK), Toluene, and Xylene. Xylene is the highest individual HAP emitted at this facility.

4. Synthetic Minor Determination:

The facility-wide synthetic minor restrictions for individual HAPs and total combined HAPs were previously made federally enforceable via draft issuance and 30-day public comment period in FEPTIO No. P0127202, issued final 12/2/2020. At the request of the facility, instead of separate HAPs restrictions for each EU as in P0127202, one set of facility-wide restrictions was established in Section B. Facility-Wide Terms and Conditions for the initial installation of spray booth #4 (K008), permit P0134092, that was issued final 8/31/2023. The terms established in P0134092 are as follows:

- Emissions of any individual hazardous air pollutant (HAP) shall not exceed 9.9 tons per year based on a rolling, 12-month summation of the monthly emissions from coatings and cleaning materials employed.
- Emissions of all hazardous air pollutants (HAPs) combined shall not exceed 24.5 tons per year based on a rolling 12-month summation of the monthly emissions from coatings and cleaning materials employed.
- No operational restriction

For this initial installation of spray booth #5 (K009), the facility-wide restrictions above were modified as described below:

VOCs are controlled by the surface coating rule 3745-21-09(U)(1)(d) that limits VOC content of coatings employed to 3.5 pound of VOC per gallon of coating, excluding water and exempt solvents, as applied. The potential to emit of VOC based on the maximum VOC content allowed and maximum daily usage for the coating spray booths #1-5 (EUs K004, K006-K009) projected to 365 days/yr is 90.15 tons per year, and the potential to emit of VOC for the permit-exempt and de minimis emission units is 2 tons per year. The facility-wide synthetic minor limitation of 95 tons per year was newly established in this permit to ensure that VOC emissions do not exceed the major source threshold of 100 tons per year with the addition of new de minimis and/or permit-exempt emissions units.

The unrestricted potential to emit of combined HAP and highest individual HAP, xylene, determined through the environmental data sheets submitted by the permittee and calculated based on the permittee's stated maximum daily usage and projected to 365 days/yr for the coating spray booths #1-5 (EUs K004, K006-K009) is 24.5 tons per year and 23.4 tons per year, respectively. The potential to emit of combined HAP and highest individual HAP, xylene, for the permit-exempt and de minimis emission units is estimated as 1 ton per year, making the facility-wide combined HAP 25.5 tons per year. As shown, synthetic minor restrictions are still needed to keep combined HAP and individual HAP below the 25 tons per year and 10 tons per year major

thresholds, respectively. The existing facility-wide HAP limits in FEPTIO P0134092 were reduced to 9.0 tons per year of any individual HAP and 22.0 tons per year of total HAP combined in this permit to prevent any exceedance of the facility-wide HAPs limits with the addition of existing and new de minimis and/or permit-exempt emissions units. The actual facility emissions in 2025 for HAP were calculated to be 4 tons for total HAP and 1.6 tons for xylene as the highest individual HAP, which demonstrates compliance with the facility-wide synthetic minor limitation and the facility remains well below the major source thresholds.

The facility is located in an Appendix A with respect to fugitive dust according to OAC rules 3745-17-08(B) and 3745-17-07(B)(1). Coating spray booths #1-5 (EUs K004, K006-K009) are fully enclosed and the operations are designed so not all sprayed material becomes airborne because it is transferred to the parts. Transfer efficiency of 55% for K004 and 25% for K006-K009 was supplied by the permittee which reduces the potential to emit of particulate emissions. Additionally, dry filtration systems are employed that reduce the remaining potential emissions by 97% for K004, 99.84% for K006-K008, and 99.3% for K009. The maximum potential to emit of particulate matter is 97 tons per year uncontrolled and 4.4 tons per year after controls for total facility-wide emissions including de minimis and permit-exempt emissions units. PM emissions are the only pollutant reduced by control equipment (for coating units only) since controls are federally enforceable per SIP-approved OAC rule 3745-17-11(C). No federally enforceable limits for PM emissions were established because they do not trigger Title V, major MACT, or PSD thresholds.

The existing facility-wide synthetic minor emission limits in FEPTIO P0134092 did not include a supporting operational restriction as required per the 1989 Seitz Memo guidance on establishing synthetic minor restrictions. This was corrected in this permit by establishing new operational restrictions as an equation that limits processing of coatings, parts cleaner, and clean-up material to a rate where the rolling, 12-month limit of VOC, combined HAP, and individual HAP is not exceeded. The equation approach is in lieu of a fixed throughput limitation to provide flexibility for the various coatings and materials used at the facility.

5. Source Emissions:

EU K009 will emit VOC, PM, and HAP emissions from coating and cleanup materials.

PTE value for VOC was calculated based on the maximum VOC allowance from OAC rule 3745-21-09(U)(1)(d) of 3.5 pounds per gallon of coating, excluding water and exempt solvents, as applied, projected to 365 days/yr and the permittee's stated maximum daily usage of coatings, parts cleaner, and cleanup materials. The emissions due to coating, parts cleaner, and cleanup material were summed to get the full PTE of the EU. Additionally, as requested by the permittee, the choice to demonstrate compliance with the VOC content limitation by means of the use of complying coatings (i.e., each coating used complies with the applicable emissions limitation, as applied) or by means of a daily volume-weighted average VOC content was established in the emissions unit monitoring and recordkeeping requirements.

PTE values for individual and total HAP content was determined through the environmental data sheets submitted by the permittee and calculated based on the permittee's stated maximum daily usage and projected to 365 days/yr. The individual HAP emitted in the greatest quantity is xylene.

PM emissions are reduced by a transfer efficiency of 25% as supplied by the permittee and the use of a dry filtration system with manufacturer rated control efficiency of 99.3%.

Natural gas combustion of the 2.71 MMBtu/hr make-up air unit heater will emit the following emissions in tons per year: VOC= 0.06, HAP= 5.8E-06, SO<sub>2</sub>= 0.01, NO<sub>x</sub>= 1.16, and CO= 0.98. The emissions are considered negligible

provided the fuel usage restriction of using only natural gas in the make-up air unit. Particulate and sulfur dioxide emissions from the unit are exempt from OAC 3745-17 and 3745-18 because the process weight input excluding gaseous fuels is less than 1,000 pounds per hour. PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and SO<sub>2</sub> emissions from the unit are exempt from BAT requirements under OAC 3745-31-05(A)(3) since the uncontrolled potential to emit is less than 10 tons per year.

The potential to emit of EU K009 is summarized in the table below, in tons per year.

| Emissions source               | VOC   | Total HAP | Individual HAP (xylene) | PM     |
|--------------------------------|-------|-----------|-------------------------|--------|
| Coating                        | 19.16 | 5.75      | 5.69                    | 0.24   |
| Cleanup solvent                | 1.06  | 0.97      | 0.00                    | —      |
| Parts cleaner                  | 0.92  | 0.84      | 0.00                    | —      |
| Make-up air unit (natural gas) | 0.06  | 5.8E-06   | —                       | exempt |
| EU K009 total                  | 21.14 | 7.56      | 5.69                    | 0.24   |

6. Ohio Toxic Air Contaminant analysis:

Toxic air contaminants (TAC) designated in OAC rule 3745-114-01 are emitted by EU K009 from the coating, the cleanup material and the parts cleaner. AERSCREEN (version 21112) modeling was performed for the K009 egress point using a normalized source emission rate of 1.0 pound per hour, with building downwash included. The overall maximum one-hour impact was 40.80 µg/m<sup>3</sup> per pound per hour, occurring approximately 53 meters from the source, and the impact at the ambient boundary was 28.28 µg/m<sup>3</sup> per pound per hour. The overall maximum was used for the compliance demonstration as the more conservative of the two. The modeled concentration for each contaminant is the product of that factor and the contaminant's maximum hourly emission rate, and the results are summarized in the table below.

| Pollutant    | TLV (ppm) | MAGLC (µg/m <sup>3</sup> ) | Emission rate (lb/hr) | Modeled 1-hour concentration (µg/m <sup>3</sup> ) | Per cent of 80% MAGLC | Result |
|--------------|-----------|----------------------------|-----------------------|---------------------------------------------------|-----------------------|--------|
| Xylenes      | 20        | 2,068                      | 1.2943                | 52.81                                             | 3.19%                 | Pass   |
| MIBK         | 20        | 1,951                      | 0.3923                | 16.00                                             | 1.03%                 | Pass   |
| Methanol     | 200       | 6,240                      | 0.2153                | 8.78                                              | 0.18%                 | Pass   |
| Toluene      | 20        | 1,795                      | 0.1996                | 8.14                                              | 0.57%                 | Pass   |
| Ethylbenzene | 20        | 2,068                      | 0.04534               | 1.85                                              | 0.11%                 | Pass   |
| n-Hexane     | 50        | 4,196                      | 0.0000                | 0.00                                              | 0.00%                 | Pass   |

As shown above, only Xylenes and MIBK are above 1 tpy (e.g. 0.22 lb/hr) meeting the definition of significant TAC and requiring modeling, but modeling was performed for all the above TAC. The one-hour maximum ground level concentration of every toxic air contaminant was below eighty per cent of the maximum acceptable ground level concentration (MAGLC). This is acceptable per ORC 3704.03(F)(4), the Ohio Toxic Air Contaminant Statute.

7. Conclusion:



**Permit Number:** P0140600  
**Facility Name:** Technibus, Inc.  
**Facility ID:** 1576051550

**Effective Date:** To be entered upon final issuance

This FEPTIO allows for the installation of a new coating spray booth that will be subject to the now-modified facility-wide synthetic minor restriction of 9.0 tons per year for any individual HAP, 22.0 tons per year for all HAP combined, and 95.0 ton per year for VOC. These restrictions are adequate to retain the facility's synthetic minor status and avoidance of MACT subpart MMMM.

8. Please provide additional notes or comments as necessary:

None

9. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u>    | <u>Tons Per Year</u> |
|---------------------|----------------------|
| Single HAP (xylene) | 5.69                 |
| Combined HAP        | 7.56                 |
| VOC                 | 21.14                |
| PM                  | 0.24                 |



**Environmental  
Protection  
Agency**

**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Technibus, Inc.

|                |                                   |
|----------------|-----------------------------------|
| Facility ID:   | 1576051550                        |
| Permit Number: | P0140600                          |
| Permit Type:   | Initial Installation              |
| Issued:        | 08/20/2026                        |
| Effective:     | To be entered upon final issuance |
| Expiration:    | To be entered upon final issuance |

**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Technibus, Inc.

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**Permit Number:** P0140600

**Facility Name:** Technibus, Inc.

**Facility ID:** 1576051550

**Effective Date:** To be entered upon final issuance

## Authorization

|                                             |                                                                                                                                                                                                                                                                        |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility ID:                                | 1576051550                                                                                                                                                                                                                                                             |
| Application Number(s):                      | A0081873A0081873                                                                                                                                                                                                                                                       |
| Permit Number:                              | P0140600                                                                                                                                                                                                                                                               |
| Permit Description:                         | Initial installation FEPTIO for a new miscellaneous metal parts Coating Spray Booth #5 (K009) with facility-wide synthetic minor restrictions for VOC, individual HAPs, and total combined HAPs to avoid Title V and Major MACT status at an existing FEPTIO facility. |
| Permit Type:                                | Initial Installation                                                                                                                                                                                                                                                   |
| Permit Fee:                                 | \$300.00 <i>DO NOT send payment at this time, subject to change before final issuance</i>                                                                                                                                                                              |
| Issue Date:                                 | 08/20/2026                                                                                                                                                                                                                                                             |
| Effective Date:                             | To be entered upon final issuance                                                                                                                                                                                                                                      |
| Expiration Date:                            | To be entered upon final issuance                                                                                                                                                                                                                                      |
| Permit Evaluation Report (PER) Annual Date: | To be entered upon final issuance                                                                                                                                                                                                                                      |

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Technibus, Inc.  
1501 RAFF ROAD SW  
Canton, OH 44710

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

Canton City Public Health Air Pollution Control  
420 Market Ave.  
Canton, OH 44702-1544  
(330)489-3385

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

John Logue  
Director



**Permit Number:** P0140600  
**Facility Name:** Technibus, Inc.  
**Facility ID:** 1576051550

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number:P0140600

Permit Description:Initial installation FEPTIO for a new miscellaneous metal parts Coating Spray Booth #5 (K009) with facility-wide synthetic minor restrictions for VOC, individual HAPs, and total combined HAPs to avoid Title V and Major MACT status at an existing FEPTIO facility.

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

|                                   |                        |
|-----------------------------------|------------------------|
| Emissions Unit ID:                | K009                   |
| Company Equipment ID:             | Coating Spray Booth #5 |
| Superseded Permit Number:         |                        |
| General Permit Category and Type: | Not Applicable         |

# List of Commonly Used Abbreviations

|                                                                   |                                                                  |                                                                                                       |
|-------------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors | HVLP = high volume, low pressure                                 | PER = Permit Evaluation Report                                                                        |
| ASTM = American Society for Testing and Materials                 | LAER = lowest achievable emission rate                           | PM = particulate matter                                                                               |
| BACT = Best Available Control Technology                          | lb(s)/hr = pound(s) per hour                                     | PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 microns   |
| BAT = Best Available Technology                                   | LDAR = leak detection and repair                                 | PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns |
| CAA = Clean Air Act                                               | LPG = liquefied petroleum gas/propane                            | ppb = parts per billion                                                                               |
| CAM = compliance assurance monitoring                             | MACT = maximum achievable control technology                     | ppm = parts per million                                                                               |
| CEMS = continuous emissions monitoring system                     | MAGLC = maximum acceptable ground level concentration            | PSD = Prevention of Significant Deterioration                                                         |
| CFC = chlorofluorocarbon                                          | mg/m <sup>3</sup> = milligrams per cubic meter                   | psi = pounds per square inch                                                                          |
| CFR = Code of Federal Regulations                                 | MM = million                                                     | psia = pounds per square inch absolute                                                                |
| CH <sub>4</sub> = methane                                         | MMBtu = million British Thermal Units                            | PTE = potential-to-emit                                                                               |
| CI = compression ignition                                         | MSDS = material safety data sheet                                | PTI = Permit-to-Install                                                                               |
| CO = carbon monoxide                                              | MSW = municipal solid waste                                      | PTIO = Permit-to-Install and Operate                                                                  |
| CO <sub>2</sub> = carbon dioxide                                  | NAAQS = National Ambient Air Quality Standard                    | PTO = Permit-to-Operate                                                                               |
| COM = continuous opacity monitor                                  | NESHAP = National Emission Standard for Hazardous Air Pollutants | PWR = process weight rate                                                                             |
| DAPC = Division of Air Pollution Control                          | NG = natural gas                                                 | RACM = reasonably available control measures                                                          |
| DO/LAA = District Office/Local Air Agency                         | ng/m <sup>3</sup> = nanograms per cubic meter                    | RACT = reasonably available control technology                                                        |
| dscf = dry standard cubic foot                                    | NH <sub>3</sub> = ammonia                                        | RATA = relative accuracy test audit                                                                   |
| EAC = emissions activity category                                 | NMHC = non-methane hydrocarbons                                  | RTO = regenerative thermal oxidizer                                                                   |
| eDocs = electronic documents database                             | NMOC = non-methane organic compound                              | SB265 = Senate Bill 265                                                                               |
| ERAC = Environmental Review Appeals Commission                    | NO = nitrogen oxide                                              | scfm = standard cubic feet per minute                                                                 |
| ESP = electrostatic precipitator                                  | NO <sub>2</sub> = nitrogen dioxide                               | SI = spark ignition                                                                                   |
| EU = emissions unit                                               | NO <sub>x</sub> = nitrogen oxides                                | SIP = State Implementation Plan                                                                       |
| FEPTIO = Federally Enforceable Permit-to-Install and Operate      | NSPS = New Source Performance Standard                           | SO <sub>2</sub> = sulfur dioxide                                                                      |
| FER = Fee Emissions Report                                        | NSR = New Source Review                                          | SSMP = startup, shutdown, and malfunction plan                                                        |
| FR = Federal Register                                             | NTV = Non-Title V                                                | TDS = total dissolved solids                                                                          |
| GACT = generally achievable control technology                    | O&M = operation and maintenance                                  | TLV = threshold limit value                                                                           |
| GHG = greenhouse gases                                            | OAC = Ohio Administrative Code                                   | TO = thermal oxidizer                                                                                 |
| gr/dscf = grains per dry standard cubic foot                      | OC = organic compound                                            | TPH = ton(s) per hour                                                                                 |
| H <sub>2</sub> S = hydrogen sulfide                               | Ohio EPA = Ohio Environmental Protection Agency                  | TPY = ton(s) per year                                                                                 |
| H <sub>2</sub> SO <sub>4</sub> = sulfuric acid                    | ORC = Ohio Revised Code                                          | TSP = total suspended particulates                                                                    |
| HAP = hazardous air pollutant                                     | Pb = lead                                                        | VE = visible emissions                                                                                |
| HCl = hydrogen chloride                                           | PBR = Permit-By-Rule                                             | VMT = vehicle miles traveled                                                                          |
| HF = hydrogen fluoride                                            | PCB = polychlorinated biphenyl                                   | VOC = volatile organic compound                                                                       |
| Hg = mercury                                                      | PE = particulate emissions                                       | WPP = work practice plan                                                                              |
| hp = horsepower                                                   | PEMS = predictive emissions monitoring system                    | µg/m <sup>3</sup> = micrograms per cubic meter                                                        |

## **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:

- a) 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.

- b) 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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 (either electronically through Ohio EPA's eBusiness Center: Air Services web service or 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 once by 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 permit evaluation report (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 of this permit 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 Canton City Public Health Air Pollution Control 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/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting 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 emission 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 shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

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

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

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall 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 PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) 3. below (Definitions)
  - b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 4. – Applicable Facility-Wide Emissions Limitations and/or Control Requirements
    - (2) 5. – Operational Restrictions
    - (3) 6. – Monitoring and/or Recordkeeping Requirements
    - (4) 7.b) – Quarterly deviation requirements

2. The Ohio EPA has determined that this facility may be subject to the “Generally Available Control Technology” (GACT) requirements of a federal rule under 40 CFR Part 63 that Ohio EPA does not have the delegated authority to implement. Specifically:

- a) the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH;

and/or

- b) the NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR Part 63, Subpart XXXXX.

Although Ohio EPA has determined that one or both of these federal rules (also known as GACT rules) may apply, at this time Ohio EPA does not have the authority to enforce these standards. Instead, U.S. EPA has the authority to enforce these standards. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. The complete text of these rules can be found at the following website: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63>

3. Definitions as used in this permit and other relevant terms:

As applied: the formulation of a coating during the application on, or impregnation into a substrate, including any dilution solvents or thinners (or other components) added at the source before application of the coating. [OAC rule 3745-21-01(D)]

As-received: the formulation of a coating material or component (e.g., one-part coating, each component of two-part coatings, thinner, reducer, colorant, or other additive) as received from the supplier. As-received is equivalent to “as-supplied” and “as-purchased.”

Cleaning material: a solvent used to remove contaminants and other materials such as dirt, grease, oil, and dried (e.g., depainting) or wet coating from a substrate before or after coating application; or from equipment associated with a coating operation, such as spray booths, spray guns, tanks and hangers. Thus, it includes any cleaning material used on substrates or equipment or both. This includes both parts cleaner and cleanup materials as specified in the permit application. [OAC rule 3745-21-01(D)]

Coating or surface coating: a material applied onto or saturated within a substrate for decorative, protective or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealers, adhesives and inks. [OAC rule 3745-21-01(D)]

Coating line: an operation consisting of a series of one or more coating applicators and any associated flash-off areas, drying areas and ovens wherein a surface coating is applied, dried, and/or cured. It is not necessary for an operation to have an oven, or flash-off area, or drying area in order to be included within this definition. [OAC rule 3745-21-01(D)]

Excluding water and exempt solvents means subtracting the volume (or volume fraction) of water and other volatile materials which are not VOC (and thus are known as “exempt solvents”) from the total volume of a coating material. [Adapted from OAC rule 3745-21-01(D)].

Exempt solvent: 1. volatile matter in a coating or cleaning material other than VOC or water. [OAC rule 3745-21-10(B)(5)] 2. any of the organic compounds that are specifically identified as exempt under the definition of “volatile organic compound” in paragraph (B)(16) of OAC rule 3745-21-01.

Hazardous air pollutant (HAP): any air pollutant listed under Section 112(b) of the Clean Air Act (USC Section 7412).

Miscellaneous metal part or product: any metal part or metal product *except* the following: cans, coils, metal furniture, large appliances, and aluminum or copper wire prior to its formation into an electromagnetic coil. [OAC rule 3745-21-01(D)]

One-part, or one-component coating: a coating that is ready for application as it comes out of its container to form an acceptable dry film. For the purpose of this definition, a thinner, necessary to reduce the viscosity, is not considered a component. [Adapted from OAC rule 3745-21-01(D)]

Organic compound (OC): any chemical compound containing carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides, metallic carbonates, ammonium carbonate, methane (except methane from landfill gases), and ethane. [OAC rule 3745-21-01(B)]

Solids: all nonvolatile matter in a coating material. Percent solids + percent volatile matter = 100%.

Toxic air contaminant (TAC): an air contaminant that has been identified by the Ohio EPA as having known toxicological effects, pursuant to ORC 3704.03(F)(3)(c). The complete list of toxic air contaminants regulated in Ohio can be found in OAC rule 3745-114-01.

Transfer efficiency (TE): the percentage of total coating solids employed by a coating applicator which adheres to the object being coated. [OAC rule 3745-21-01(D)]

Two-part, or two-component coating: a coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film. May also be known as a multi-component coating, especially if the as-applied mixture includes another additive material in addition to the catalyst or hardener. [Adapted from OAC rule 3745-21-01(D)]

Volatile matter: all non-solid matter in a coating material, including water. Percent solids + percent volatile matter = 100%.

Volatile organic compounds (VOC): a subset of organic compounds (OC) that participate in atmospheric photochemical reactions. Organic compounds that are specifically identified as *not* being “volatile organic compounds” are listed under the definition of “volatile organic compound” in paragraph (B)(16) of OAC rule

3745-21-01. When used in coating or cleaning materials, those compounds in the list just described are known as “exempt solvents.”

4. Applicable Facility-Wide Emissions Limitations and/or Control Requirements

- a) The combined emissions from all non-de minimis and non-permit-exempt emissions units\* at this facility shall not exceed the emissions limitations in the table below. At the time of this permit’s issuance, the affected emissions units are K004, K006, K007, K008, and K009.

|     | Applicable Rules/Requirements                                                                                                                                                                                                                                         | Applicable Emissions Limitations                                                                                                                                                                                                                                                                                                                                                                                  |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (1) | OAC rule 3745-31-05(D)<br>[Synthetic Minor restrictions to avoid Title V applicability and MACT applicability under 40 CFR Part 63, Subpart M—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products] | <p>Emissions of any individual HAP shall not exceed 9.0 tons per year based on a rolling, 12-month summation of the monthly emissions.</p> <p>Emissions of all HAPs combined shall not exceed 22.0 tons per year based on a rolling 12-month summation of the monthly emissions.</p> <p>Emissions of VOC shall not exceed 95.0 tons per year based on a rolling, 12-month summation of the monthly emissions.</p> |

\* The combined potential emissions of each individual HAP, total HAPs, and total VOC from all de minimis and permit-exempt emissions units at this facility have been estimated to be less than 1 ton, 2 tons, and 2 tons respectively. When added to the facility-wide limitations for non-de minimis and non-permit-exempt emissions units in 4.a)(1), the maximum facility-wide potential emissions of each individual HAP, total combined HAPs, and total VOC will remain below the respective major Title V and major MACT source thresholds. Accordingly, there shall be no monitoring or recordkeeping requirements for any de minimis or permit-exempt emissions unit at this facility for the purpose of demonstrating compliance with the facility’s synthetic minor status. Should new de minimis and/or permit-exempt emissions units be installed at the facility, their potential emissions shall be evaluated to determine if they cause an increase above these values.

- b) Additional Terms and Conditions

(1) None.

5. Operational Restrictions

- a) The maximum HAP-containing material usage for emissions units K004, K006, K007, K008, and K009, combined, shall not cause individual HAP emissions to exceed 9.0 tons as a rolling, 12-month summation based on the following equations:

$$(1) \quad X = \sum_{i=1}^n (P)(\text{HAP}_i) / 2,000 \text{ lbs}$$

Where:

X = tons of highest individual HAP emissions per month;



P = monthly usage of each HAP-containing material, in gallons;

HAP<sub>i</sub> = highest individual HAP content of each HAP-containing material, in pounds per gallon;

n = total number of HAP-containing materials used; and

(2)  $\Sigma(X)$  is  $\leq 9.0$  tons highest individual HAP, as a rolling 12-month summation.

b) The maximum HAP-containing material usage for emissions units K004, K006, K007, K008, and K009, combined, shall not cause total HAP emissions to exceed 22.0 tons as a rolling, 12-month summation based on the following equations:

(1)  $Y = \sum_{i=1}^n (P)(\text{HAP}_i) / 2,000 \text{ lbs}$

Where:

Y = tons of total HAP emissions per month;

P = monthly usage of each HAP-containing material, in gallons;

HAP<sub>i</sub> = HAP content of each HAP-containing material, in pounds per gallon;

n = total number of HAP-containing materials used; and

(2)  $\Sigma(Y)$  is  $\leq 22.0$  tons total HAP, as a rolling 12-month summation.

c) The maximum VOC-containing material usage for emissions units K004, K006, K007, K008, and K009, combined, shall not cause VOC emissions to exceed 95.0 tons as a rolling, 12-month summation based on the following equation:

(1)  $Z = \sum_{i=1}^n (P)(\text{VOC}) / 2,000 \text{ lbs}$

Where:

Z = tons of VOC emissions per month;

P = monthly usage of each VOC-containing material, in gallons;

VOC = VOC content of each VOC-containing material, in pounds per gallon;

n = total number of VOC-containing materials used; and

(2)  $\Sigma(Z)$  is  $\leq 95.0$  tons VOC, as a rolling 12-month summation.

## 6. Monitoring and/or Recordkeeping Requirements

a) In this term, "emissions unit" refers to a non-de minimis or non-permit-exempt emissions unit that is a source of HAP or VOC emissions, which includes emissions units K004, K006, K007, K008, and K009. The permittee shall collect and record the following information each month:

(1) For each emissions unit, the name and/or identification number of each HAP-containing and VOC-containing material employed, including coating and cleaning materials.

(2) The name and CAS No. of each individual HAP contained in each material identified in (1) above, and the content, in pounds per gallon, of each individual HAP in each such material, as applied, calculated in accordance with the procedure described for  $C_{\text{HAP},i}$  in 9.a) below, under Miscellaneous Requirements.



- (3) The actual VOC content, in pounds per gallon as applied, of each material identified in (1) above, calculated in accordance with the Compliant Coating procedure described for  $C_{VOC,2}$  in 9.b)(1) or the Daily Weighted Average procedure described for  $C_{VOC,2}$  in 9.b)(2), under Miscellaneous Requirements.
- (4) For each emissions unit, determine and record the number of gallons employed during the month of each material identified in (1) above. The permittee shall utilize whatever method the permittee decides is most suitable for determining the number of gallons of each material employed.
  - a. For cleaning materials, the permittee may choose to record only the net number of gallons employed, defined as the gross number of gallons employed during the month minus the number of gallons recovered and/or sent off-site for disposal during the month.
- (5) For each emissions unit, the monthly emissions of each individual HAP, in pounds, to be calculated as follows:
  - a. For each HAP-containing material employed in the emissions unit, multiply the number of gallons used during the month from (4) above by the content in lb/gal from (2) above of each individual HAP contained in the material. Then, for each individual HAP, sum the results for all materials which contain that specific HAP.
  - b. For each individual HAP, sum the results from "a." above to get its monthly emissions, in pounds, from the emissions unit.
- (6) For each emissions unit, the emissions of total HAPs, in pounds, to be calculated as the sum of all the individual HAP emissions from (5)b. above.
- (7) For each emissions unit, the monthly VOC emissions, in pounds, to be calculated as follows:
  - a. For each VOC-containing material employed in the emissions unit, multiply the number of gallons used during the month from (4) above by the actual VOC content in lb/gal from (3) above.
  - b. Sum the results from "a" above to get the monthly VOC emissions, in pounds, from the emissions unit.
- (8) The facility-wide monthly emissions of each individual HAP, in tons, i.e., the summation of the individual HAP emissions for each emissions unit from (5)b. above for all emissions units combined, then divided by 2000 pounds per ton.
- (9) The facility-wide monthly emissions of total HAPs, in tons, i.e., the summation of total HAPs emissions for each emissions unit from (6) above for all emissions units combined, then divided by 2000 pounds per ton.
- (10) The facility-wide monthly emissions of total VOC, in tons, i.e., the summation of total VOC emissions for each emissions unit from (7)b. above for all emissions units combined, then divided by 2000 pounds per ton.
- (11) The facility-wide rolling 12-month summation of emissions of each individual HAP, in tons, i.e., the summation of the facility-wide monthly emissions of each individual HAP from (8) above for the most recent month and the previous 11 months.



- (12) The facility-wide rolling 12-month summation of total HAPs emissions, in tons, i.e., the summation of the facility-wide monthly emissions of total HAPs from (9) above for the most recent month and the previous 11 months.
- (13) The facility-wide rolling 12-month summation of total VOC emissions, in tons, i.e., the summation of the facility-wide monthly emissions of total VOC from (10) above for the most recent month and the previous 11 months.

## 7. Reporting Requirements

- a) All applications, notifications, or reports required in writing are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered submitted on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- b) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - a. all exceedances of the facility-wide rolling 12-month individual HAP emission limitation of 9.0 tons as recorded in 6.a)(11) above; and
    - b. all exceedances of the facility-wide rolling 12-month total combined HAPs emission limitation of 22.0 tons as recorded in 6.a)(12) above.
    - c. all exceedances of the facility-wide rolling 12-month total VOC emission limitation of 95.0 tons as recorded in 6.a)(13) above.
  - (2) the probable cause of each deviation (excursion);
  - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred for any of the emission limitations referenced in 7.b)(1)a.-c. above during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. The "no deviations" report shall identify the specific emission limitations to which it refers.

If a deviation (excursion) occurred for some, but not all of the emission limitations referenced in 7.b)(1)a.-c. above during a calendar quarter, in addition to reporting the deviation per 7.b)(1)-(4) above, the quarterly deviation report shall identify which of the specific emission limitation for which there were no deviations (excursions).

The quarterly reports shall be submitted each year by January 31 (covering October - December), April 30 (covering January - March), July 31 (covering April - June), and October 31 (covering July - September).

## 8. Testing Requirements

- a) Compliance with the emission limitations and/or control requirements specified in section 4. of these facility-wide terms and conditions shall be determined in accordance with the following methods:

(1) Emissions Limitation:

Emissions of any individual Hazardous Air Pollutant (HAP) shall not exceed 9.0 tons per year, based upon a rolling 12-month summation of the monthly emissions from all emissions units combined.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping found in term 6.a)(11) above.

(2) Emissions Limitation:

Emissions of all Hazardous Air Pollutants (HAPs) combined shall not exceed 22.0 tons per year, based upon a rolling 12-month summation of the monthly emissions from all emissions units combined.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping found in term 6.a)(12) above.

(3) Emissions Limitation:

Emissions of all VOC combined shall not exceed 95.0 tons per year, based upon a rolling 12-month summation of the monthly emissions from all emissions units combined.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping found in term 6.a)(13) above.

## 9. Miscellaneous Requirements

Values for material properties required in a) and b) below shall be determined either by the procedures set forth in U.S. EPA Method 24\* or from formulation data provided by the manufacturer of the material, except for individual HAP and exempt solvents information that can only be obtained from formulation data.

\* Method 24, as described in 40 CFR Part 60, Appendix A, is applicable for the determination of volatile matter content, water content, density, volume solids, and weight solids of paint, varnish, lacquer, or other related surface coatings.

- a) The following method shall be used to calculate the individual HAP content, in pounds per gallon, for each individual HAP in each HAP-containing material:

$$C_{\text{HAP}, i} = (D)(W_{\text{HAP}, i})$$

where:

D = the overall density of the material, in pounds per gallon.

$W_{\text{HAP}, i}$  = the weight fraction of the individual HAP "i" in the material



- b) One of the following methods shall be used to calculate the actual VOC content, in pounds per gallon, of any VOC-containing material:

(1) Compliant Coating Option

The mass of VOC per volume of each coating, in pounds per gallon, excluding water and exempt solvents, as applied, is calculated with the following equation:

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC})$$

Where:

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

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

Where:

$W_{VM}$  = 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.

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

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

Where:

$V_{VM}$  = 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.

If the permittee mixes compliant coatings, it is not necessary to record the VOC content of the resulting mixture.

(2) Daily Weighted Average Option

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

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n (C_{VOC,2i})(L_{Ci})(V_{Si} + V_{VOCi})}{\sum_{i=1}^n (L_{Ci})(V_{Si} + V_{VOCi})}$$

Where:

$(C_{VOC,2})_A$  is the daily volume-weighted average VOC content of all coatings, as applied; and

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



$$C_{VOC,2} = (D_c)(W_{VOC}) / (V_s + V_{VOC})$$

Where:

$D_c$  = density of coating, in pounds of coating per gallon of coating

$W_{VOC}$  = weight fraction of VOC in a coating calculated as  $W_{VOC} = W_{VM} - W_W - W_{ES}$

Where:

$W_{VM}$  = 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

$V_s$  = the volume fraction of solids in coating, in gallons of solids per gallon of coating;

$V_{VOC}$  = volume fraction of VOC in a coating calculated as  $V_{VOC} = V_{VM} - V_W - V_{ES}$

Where:

$V_{VM}$  = 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 is per day and not included in the calculation.

Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of all coatings and cleaning materials.

- c) Optional additional recordkeeping recommended for total organic compounds (OCs).

Background:

As described in the Definitions in term 3. above of the Facility-Wide Terms and Conditions, some materials contain exempt solvents, which are organic compounds (OCs) that have been identified as being exempt from the definition of “VOC” for regulatory purposes because they do not participate in photochemical reactions. For a given liquid material, the total organic compound (OC) content equals the sum of the VOCs and any exempt solvents.



Only VOCs are included in the definition of “regulated air pollutant” in OAC rule 3745-77-01 for the purpose of Title V major source applicability; i.e., potential-to-emit of 100 tons per year. For this reason, the emissions limitation in 4.a)(1) above include only emissions of VOCs rather than total OCs. Accordingly, the monitoring and recordkeeping requirements necessary to demonstrate compliance with the emissions limitation for VOCs includes include only VOCs, not total OCs.

OCs needed for annual Fee Emission Report:

As described in term A.4 of the Standard Terms and Conditions of this permit, there is a rule-based requirement in OAC Chapter 3745-78 for the permittee to report the actual emissions of total OCs on an annual calendar year basis for the purpose of emissions fees; i.e., the annual Fee Emission Report (FER). For this reason, if any of the materials employed contain exempt solvents, it is highly recommended that the permittee maintain records of the total OC content and usage-based OC emissions for all OC-containing materials along with the recordkeeping required in this permit for all HAP-containing and VOC-containing materials. This may include the need to keep records for some organic materials that contain only exempt solvents (i.e., zero VOCs).



**Environmental  
Protection  
Agency**

**Permit Number:** P0140600

**Facility Name:** Technibus, Inc.

**Facility ID:** 1576051550

**Effective Date:** To be entered upon final issuance

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

**1. K009, Coating Spray Booth #5**

Operations, Property and/or Equipment Description:

Coating spray booth for miscellaneous metal parts, rated at 1.25 gal/hr of coating. Includes one 2.71 MMBtu/hr natural gas-fired make-up air unit to provide heated air (less than 200 deg F) to the booth as needed to reduce drying time. Particulate emissions from coating overspray conducted within a complete enclosure are controlled by a dry filter system.

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)h., d)(7)-(10), and e)(3)c.

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a.

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)<br>[Synthetic Minor restrictions to avoid Title V applicability and MACT applicability under 40 part 63, subpart MMMM-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products] | Synthetic minor restrictions for this emissions unit have been incorporated into Section B. of this permit, Facility-Wide Terms and Conditions.<br><br>b)(2)a.-b.                                                                                                                 |
| b. | ORC 3704.03(T)<br>OAC rule 3745-31-05(A)(3)<br>[BAT for pollutants with PTE >10 tpy]                                                                                                                                                                                 | The BAT requirements under rule for VOC emissions is equivalent to the emissions limitation established pursuant to OAC rule 3745-21-09(U)(1).                                                                                                                                    |
| c. | OAC rule 3745-31-05(A)(3)(a)(ii)<br>[BAT exemption for pollutants with PTE <10 tpy]                                                                                                                                                                                  | The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM <sub>10</sub> , PM <sub>2.5</sub> , NO <sub>x</sub> , CO, and SO <sub>2</sub> emissions from this EU's natural-gas combustion since the uncontrolled potential to emit is less than 10 tons per year. |



|    |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                          |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| d. | OAC rule 3745-21-09(U)(1)(d)<br>[VOC emissions limitations for surface coating of miscellaneous metal parts and products, for any coating that is dried at temperatures not exceeding 200 deg F] | The VOC content of the coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.                                                                                                                                                      |
| e. | OAC rule 3745-17-07(A)<br>[Visible particulate emission limitations for stack emissions]                                                                                                         | The limitations established pursuant to paragraph (A) of this rule do not apply to this emissions unit because it qualifies for an exemption pursuant to paragraph (A)(3)(h) of this rule, specifically because it is not subject to any mass emission limitation under any of the rules listed therein. |
| f. | OAC rule 3745-17-11(C)<br>[Restrictions on particulate emissions from industrial processes; requirements for surface coating processes]                                                          | The permittee shall comply with the control requirements and work practices for the coating operations portion of this EU as required by this rule as listed in terms c)(1)-(2) and d)(2)-(6) below.                                                                                                     |
| g. | OAC rule 3745-17-11(B)<br>OAC rule 3745-18-06(E)(1)<br>OAC rule 3745-18-82(A)(3)                                                                                                                 | The natural-gas make-up air unit portion of this EU is exempt from this rule.<br>See b)(2)c. and c)(3).                                                                                                                                                                                                  |
| h. | ORC 3704.03(F)(3)(c) and (F)(4)<br>OAC rule 3745-114-01<br>[Toxic Air Contaminants]                                                                                                              | See d)(8)-(11) and e)(3)b. below.                                                                                                                                                                                                                                                                        |

(2) Additional Terms and Conditions

- a. The annual potential emissions of VOC and HAPs associated with the combustion of natural gas in the make-up air unit for this EU are negligible (less than 0.06 and 5.8E-06 ton/yr, respectively) such that monitoring and recordkeeping terms and conditions for this source of these pollutants have not been established in this permit.
- b. The only terms and conditions involving the combustion of natural gas are the Operational Restriction in c)(3) below and the associated monitoring, recordkeeping and reporting requirements.
- c. For the purpose of OAC 3745-18 and OAC 3745-17 applicability, the natural-gas make-up air unit portion of this EU is considered process equipment. The burning of natural gas for direct heat transfer in the natural-gas make-up air unit associated with this EU is the only source of SO<sub>2</sub> from this emissions unit and the only source of particulate from the make-up air unit portion of the EU. Pursuant to OAC rule 3745-18-06(C), this EU is exempt from OAC rules 3745-18-06(E) and 3745-18-82, and also is exempt from OAC rule 3745-17-11(B) because the process weight input (excludes gaseous fuels) that causes any emissions of SO<sub>2</sub> or particulate from the make-up air unit portion of the EU is equal to zero, which is less than 1,000 lb/hr. To continue this exemption for the make-up air unit portion of this EU, an Operational Restriction involving the combustion of natural



gas was established in c)(3) along with the associated monitoring, recordkeeping and reporting requirements below.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the dry particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee, the dry particulate filter system shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) The permittee shall fire only natural gas as fuel in the make-up air unit servicing this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for the miscellaneous metal parts coating line to demonstrate compliance with the coating VOC content limitations, either by means of use of complying coatings (i.e., each coating used complies with the applicable emissions limitation, as applied) or by means of a daily volume-weighted average VOC content and shall maintain this information at the facility for a period of three years:
  - a. Compliant Coating Option. If selecting this option, the permittee must collect and record the following information each month:
    - i. the name and identification number of each coating, as applied; and
    - ii. the mass of VOC per volume of each coating, in pounds per gallon, excluding water and exempt solvents, as applied, calculated as detailed in term f)(1)a.i. for  $C_{VOC,2}$ .
    - iii. This information does not have to be kept on a line-by-line basis. If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.
  - b. Daily Weighted Average Option. If selecting this option, the permittee must collect and record the following information each day:
    - i. the name and identification number of each coating, as applied;
    - ii. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
    - iii. 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  $C_{VOC,2}$ , shown in term f)(1)a.ii.



- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, with any modifications or additions deemed necessary by the permittee.
- (3) 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 or additions deemed necessary by the permittee. These periodic inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, if available, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. If the manufacturer's recommendation for inspection frequency is not available, the permittee shall develop and maintain an internal inspection plan that includes frequency.
- (4) In addition to the recommended periodic inspections described in (3) above, 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 it is able to operate in accordance with the manufacturer's recommendations, instructions, or operating manuals, with any modifications or additions deemed necessary by the permittee.
- (5) 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/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.
- (6) 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 or was not operated in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee.
- (7) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit, K009, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The *Toxic Air Contaminant Statute*, as embodied in ORC 3704.03(F)(3)(c) and ORC 3704.03(F)(4) [hereafter referred to as just the *Toxic Air Contaminant Statute*], was applied to this emissions unit for each toxic air contaminant (TAC) listed in OAC rule 3745-114-01, using data from the permit application no. A0081873; and modeling was performed for each TAC emitted at over one ton per year using an air dispersion model such as AERSCREEN, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result from the approved air dispersion model, was compared to the maximum acceptable ground level concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic air contaminant



emitted from emissions unit K009 (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices;" or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices;" the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV was divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the maximum potential operating hours of the emissions unit, i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground Level Concentration (MAGLC):

$$(TLV/10) \times (8/24) \times (5/7) = (4)(TLV)/(24)(7) = TLV/42 = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the "worst case" toxic air contaminant from among the potential significant toxic air contaminants to be evaluated, with "significant" being defined in Engineering Guide No. 69 (Ohio EPA DAPC) as having potential emissions of 1 or more tons/year. In this case, xylene was the "worst case" significant toxic air contaminant that was evaluated. MIBK is the other significant toxic air contaminant that was evaluated.

Toxic Contaminant: xylene (CAS No. 1330-20-7)

TLV (mg/m<sup>3</sup>): 86.84

Max. Hourly Emission Rate (lb/hr): 1.29

Predicted 1-Hour Maximum Ground Level Concentration (µg/m<sup>3</sup>): 52.81

MAGLC (µg/m<sup>3</sup>): 2,068  $[(4)(86.84 \text{ mg/m}^3)/(24)(7) \times (1000 \text{ µg/mg}) = 2,068 \text{ µg/m}^3]$

$52.81 \text{ µg/m}^3 / 2,068 \text{ µg/m}^3 = 0.03 \text{ or } 3\%$

The permittee has demonstrated that emissions of the "worst case" toxic air contaminant, xylene, from emissions unit K009 are calculated to be less than 80% of the maximum acceptable ground level concentration (MAGLC). Any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*.

- (8) Prior to making any physical changes to or changes in the method of operation of emissions unit K009 that could impact the parameters or values that were used in the predicted 1-hour



maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials that would result in the emission of a new toxic air contaminant with a lower threshold limit value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01 that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the *Toxic Air Contaminant Statute* will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745 31 01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute* has been documented. If the change(s) meet(s) the definition of a "modification", permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*:
  - a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic air contaminants emitted, change in stack/exhaust parameters, etc.).
  - b. The maximum acceptable ground level concentration (MAGLC) for each significant toxic air contaminant or the worst-case contaminant, calculated in accordance with the *Toxic Air Contaminant Statute*.
  - c. A copy of the computer model run(s) that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit to be in compliance with the *Toxic Air Contaminant Statute*, initially and for each change that requires reevaluation of the toxic air contaminant emissions.
  - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, and documentation of any determination that was conducted to reevaluate compliance due to a change made to the emissions unit or the materials applied.
- (10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the *Toxic Air Contaminant*



*Statute*, through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

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

e) Reporting Requirements

- (1) All applications, notifications, or reports required in writing are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered submitted on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record from d)(1)a. above showing the use of noncomplying coatings or from d)(1)b. above showing daily volume-weighted average VOC content that exceeds the applicable limitation. The notification shall include a copy of the monthly record and shall be submitted within 30 days after the end of the month during which the exceedance occurred. [OAC rule 3745-21-09(B)(3)(g)]
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA 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.

The permittee shall also provide the following information in the annual PER:

- a. as recorded in d)(6) above, any time periods when the dry particulate filter system was not in service when the emissions unit was in operation, or was not operated in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee;
- b. as recorded in d)(5), any inspection of the dry particulate filter system that identified a problem, specify the date of the inspection, the problem identified, and the date the problem was corrected;
- c. as recorded in d)(10) above, any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the *Toxic Air Contaminant Statute*, as embodied in ORC 3704.03(F)(3)(c) and ORC 3704.03(F)(4), through the predicted 1-hour maximum ground-level concentration. If no changes to



the emissions, the emissions unit, or the exhaust stack have been made, then the report shall include an affirmative statement to this effect; and

- d. as recorded in d)(11) above, all days during which a fuel other than natural gas was burned in the make-up air unit portion of this EU, and the type and quantity of fuel burned on those days.

f) **Testing Requirements**

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

- a. Emissions Limitation

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method

Compliance with the coating content limitation shall be demonstrated by the monitoring and recordkeeping per term d)(1) and one of the options below.

- i. Compliant Coating Option

The mass of VOC per volume of each coating, in pounds per gallon, excluding water and exempt solvents, as applied, is calculated with the following equation:

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC})$$

Where:

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

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

Where:

$W_{VM}$  = 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.

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

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

Where:

$V_{VM}$  = 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.

If the permittee mixes compliant coatings, it is not necessary to record the VOC content of the resulting mixture.

ii. Daily Weighted Average Option

The daily volume-weighted average VOC content of all coatings, as applied, is calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC<sub>2</sub>, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^n (C_{VOC,2i})(L_{Ci})(V_{Si} + V_{VOCI}) / \sum_{i=1}^n (L_{Ci})(V_{Si} + V_{VOCI})$$

Where:

$(C_{VOC,2})_A$  is the daily volume-weighted average VOC content of all coatings, as applied; and

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

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC})$$

$D_C$  = density of coating, in pounds of coating per gallon of coating;

$W_{VOC}$  = weight fraction of VOC in a coating calculated as  $W_{VOC} = W_{VM} - W_W - W_{ES}$

$W_{VM}$  = 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

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

$V_{VOC}$  = volume fraction of VOC in a coating calculated as  $V_{VOC} = V_{VM} - V_W - V_{ES}$

$V_{VM}$  = 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 is per day and not included in the calculation.

Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of all coatings and cleaning materials.

b. Operational Restriction:

The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping per terms d)(2)-(5).

c. Operational Restriction:

In the event the dry particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee, the dry particulate filter system shall be expeditiously repaired or otherwise returned to these documented operating conditions.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping per terms d)(6).

d. Operational Restriction:

The permittee shall fire only natural gas as fuel in the make-up air unit servicing this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping per terms d)(11).

g) Miscellaneous Requirements

(1) None.