



10/05/2026

Tyler West
Universal Plastics - Middlefield
15285 South State Ave.
Middlefield, OH 44062

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

Facility ID: 0228000127
Permit Number: P0140811
Permit Type: Administrative Modification
County: Geauga

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCEABLE 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
Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
Twinsburg, OH 44087

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 Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Pennsylvania; Canada

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

Draft Air Pollution Permit-to-Install and Operate Administrative Modification

Universal Plastics - Middlefield
15285 SOUTH STATE STREET
Middlefield, OH 44062

ID#: P0140811

Date of Action: 10/05/2026

Permit Desc: Administrative modification FEPTIO for 10 plastic coating operations (R007 - R016) to remove the 2.7 TPY Rolling 12-month VOC limitation [OAC 3745-21-26(A)(1)(a)] and replace with individual coating VOC limitations listed in Option one of OAC 3745-21-26(C)(1). The facility-wide emissions are limited to 49.5 TPY of VOC, 7.9 TPY of each individual HAP, and 19.9 TPY of combined total HAPs, along with an annual combined coating usage limit of 15,080 gallons. Metal coating operation limitations and requirements are also added to each EU.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit P0140811 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

Universal Plastics – Middlefield (UPM) is a job shop for coating miscellaneous metal or plastic parts. The facility has ten (10) paint spray booths with overspray filters (R007, R008, R009, R010, R011, R012, R013, R014, R015, and R016), injection molding machines (P001), which are permitted under PBR per OAC rule 3745-31-03 (C)(2)(b), “de minimis” drying ovens (P002), and permit exempted heating unit (P003).

3. Facility Emissions and Attainment Status:

The facility is located within the village of Middlefield in Geauga County, an area designated as "attainment" for sulfur dioxide, PM_{2.5}, carbon monoxide, and lead, and an “moderate non-attainment” area for ozone. UPM is not a “Major Source” for PE and will not be a “Major Source” for emissions of VOC, each individual HAP, and total combined HAPs under the federally enforceable restrictions contained in this permit. The facility is not subject to requirements under Title V, 40 CFR Part 63, Subpart Mmmm – Surface Coating of Miscellaneous Metal Parts and Products, and Subpart Pppp – Surface Coating of Plastic Parts and Products.

4. Source Emissions:

This FEPTIO contains the following federally enforceable facility-wide restrictions, based upon a rolling, 12-month summation, to avoid being a “Major Source” and subject to the requirements of Title V, 40 CFR Part 63, Subpart Mmmm – Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR Part 63, Subpart Pppp – Surface Coating of Plastic Parts and Products MACT, as well as the requirements of RACT study:

- a) 49.5 TPY of VOC;
- b) 7.9 TPY of each individual HAP; and
- c) 19.9 TPY of total combined HAPs.

This permit is also required to track emissions, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the Title V and MACT Subparts Mmmm and Pppp thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

In this FEPTIO, UPM chooses to comply with the OAC 3745-21-26 by using low-VOC coatings, specified in “Option one” of OAC rule 3745-21-26(C)(1), and using application methods specified in OAC rule 3745-21-26(D), instead of exemption from the requirements in OAC rule 3745-21-26(B) – (I) under OAC rule 3745-21-26(A)(1)(a).



Draft Permit-to-Install and Operate

Universal Plastics - Middlefield

Permit Number: P0140811

Facility ID: 0228000127

Effective Date: To be entered upon final issuance

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{Facility-wide}	49.5
HAP _{Facility-wide}	7.9
HAPs _{Facility-wide}	19.9
PE _{R007 – R016}	24.1



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Universal Plastics - Middlefield

Facility ID:	0228000127
Permit Number:	P0140811
Permit Type:	Administrative Modification
Issued:	10/05/2026
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
Universal Plastics - Middlefield

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Authorization

Facility ID: 0228000127
Application Number(s): A0082689, A0082136A0082689, A0082136
Permit Number: P0140811
Permit Description: Administrative modification FEPTIO for 10 plastic coating operations (R007 - R016) to remove the 2.7 TPY Rolling 12-month VOC limitation [OAC 3745-21-26(A)(1)(a)] and replace with individual coating VOC limitations listed in Option one of OAC 3745-21-26(C)(1). The facility-wide emissions are limited to 49.5 TPY of VOC, 7.9 TPY of each individual HAP, and 19.9 TPY of combined total HAPs, along with an annual combined coating usage limit of 15,080 gallons. Metal coating operation limitations and requirements are also added to each EU.
Permit Type: Administrative Modification
Permit Fee: \$1,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/05/2026
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:

Universal Plastics - Middlefield
15285 SOUTH STATE STREET
Middlefield, OH 44062

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

Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
Twinsburg, OH 44087
(330)963-1200

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

Authorization (continued)

Permit Number: P0140811

Permit Description: Administrative modification FEPTIO for 10 plastic coating operations (R007 - R016) to remove the 2.7 TPY Rolling 12-month VOC limitation [OAC 3745-21-26(A)(1)(a)] and replace with individual coating VOC limitations listed in Option one of OAC 3745-21-26(C)(1). The facility-wide emissions are limited to 49.5 TPY of VOC, 7.9 TPY of each individual HAP, and 19.9 TPY of combined total HAPs, along with an annual combined coating usage limit of 15,080 gallons. Metal coating operation limitations and requirements are also added to each EU.

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

Group Name:Coating operations

Emissions Unit ID:	R007
Company Equipment ID:	Paint Spray Booth #44A
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R008
Company Equipment ID:	Paint Spray Booth #44B
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R009
Company Equipment ID:	Paint Spray Booth #45
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R010
Company Equipment ID:	Paint Spray Booth #46
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R011
Company Equipment ID:	Paint Spray Booth #47
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R012
Company Equipment ID:	Paint Spray Booth #48
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R013
Company Equipment ID:	Paint Spray Booth #49
Superseded Permit Number:	P0133069



General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R014
Company Equipment ID:	Paint Spray Booth #50A
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R015
Company Equipment ID:	Paint Spray Booth #50B
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069
Emissions Unit ID:	R016
Company Equipment ID:	Paint Spray Booth #52
Superseded Permit Number:	P0133069
General Permit Category and Type:	Not Applicable P0133069

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 ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = 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 ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = 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 ₂ = 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 ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = 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 ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = 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 ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = 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 ³ = 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 Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B).



Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

Yes. Under Ohio law, the Director or his/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) None.
 - 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) B.2.

2. Federally Enforceable Emissions Limitations and/or Control Requirements

a) Applicable Emissions Limitations and/or Control Requirements

- (1) Facility-wide emissions 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
(1)	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Being Subject to Title V and MACT requirements)	See B.2.a)(2)a. and B.2.b)(1) below.

(2) Additional Terms and Conditions

- a. The combined facility-wide emissions, based upon a rolling, 12-month summation, shall not exceed the following limitations:
 - i. 49.5 TPY of VOC;
 - ii. 7.9 TPY of each individual HAP¹; and
 - iii. 19.9 TPY of total combined HAPs.
- b) Operational Restrictions
 - (1) The maximum amount of coating usage for EUs R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016, combined, shall not exceed 15,080 gallons per year, based upon a rolling, 12-month summation.

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, and is also available at U.S. EPA's website at <https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications>.

c) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall keep the following facility-wide information each month:

- a. The monthly VOC emissions;
- b. The rolling, 12-month summation of VOC emissions, in tons;
- c. The monthly of each individual HAP emissions;
- d. The rolling, 12-month summation of each individual HAP emissions, in tons;
- e. The monthly of total combined HAPs emissions; and
The rolling, 12-month summation of total combined HAP emissions, in tons.

(2) The permittee shall keep the following information each month for EUs R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016, combined:

- a. The monthly total coating usage, in gallons; and
- b. The rolling, 12-month summation of total coating usage, in gallons.

d) Reporting Requirements

- (1) The reports required by this permit shall be submitted in accordance with the reporting requirements specified in Section A, Standard Terms and Conditions.
- (2) 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 Ohio EPA 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. Signatures by the signatory authority may be represented as provided through procedures established in Air Services.
- (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE



of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:

- i. Any exceedances of the facility-wide emissions, based upon a rolling 12-month summation:
 - (a) 49.5 TPY of VOC;
 - (b) 7.9 TPY of each individual HAP; and
 - (c) 19.9 TPY of total combined HAPs.
- ii. Any exceedances of the total coating usage, based upon a rolling, 12-month summation, for EUs R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016, combined:
 - (a) 15,080 gallons per year.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

e) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section B.2.a) of these T&Cs shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The facility-wide emissions, based upon a rolling, 12-month summation, shall not exceed the following limitations:

 - i. 49.5 TPY of VOC
 - ii. 7.9 TPY of each individual HAP; and
 - iii. 19.9 TPY of total combined HAPs.



Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section B.2.c)(1) above.

b. Operational Restriction:

The maximum amount of coating usage for EUs R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016, combined, shall not exceed 15,080 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section B.2.c)(2) above.

f) **Miscellaneous Requirements**

- (1) The facility is not a major source of HAP(s). In accordance with 40 CFR § 63.3881(b), 40 CFR Part 63, Subpart MMMM, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, is not applicable.
- (2) The facility is not a major source of HAP(s). In accordance with 40 CFR § 63.4481(b), 40 CFR Part 63, Subpart PPPP, NESHAP for Surface Coating of Plastic Parts and Products, is not applicable.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group – Surface Coating operations: R007, R008, R009, R010, R011, R012, R013, R014, R015, and R016

EU ID	Operations, Property and/or Equipment Description
R007	Paint Spray Booth #44A for surface coating plastic parts and products.
R008	Paint Spray Booth #44B for surface coating plastic parts and products.
R009	Paint Spray Booth #45 for surface coating plastic parts and products.
R010	Paint Spray Booth #46 for surface coating plastic parts and products.
R011	Paint Spray Booth #47 for surface coating plastic parts and products.
R012	Paint Spray Booth #48 for surface coating plastic parts and products.
R013	Paint Spray Booth #49 for surface coating plastic parts and products.
R014	Paint Spray Booth #50A for surface coating plastic parts and products.
R015	Paint Spray Booth #50B for surface coating plastic parts and products.
R016	Paint Spray Booth #52 for surface coating plastic parts and products.

- 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)g., d)(2), d)(3), d)(4), d)(5), and e)(1).
- (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)f.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each EU along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	VE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 lb/hr.
c.	OAC rule 3745-17-11(C)	See b)(2)a.
d.	OAC rule 3745-21-26(C)(1)	See b)(2)b., c)(1), and c)(2).
e.	OAC rule 3745-31-05(A)(3) PTI 02-12102	See b)(2)c.
f.	OAC rule 3745-31-05(D)	See B.2. above.
g.	ORC 3704.03(F) and OAC rule 3745-114	See d)(2), d)(3), d)(4), d)(5), and e)(1).
h.	40 CFR Part 60, Subpart TTT	See b)(2)d and b)(2)e.

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-17-11(C)(3), each EU of R007, R008, R009, R010, R011, R012, R013, R014, R015, and R016 shall comply with PE limitation identified in PTI 02-12102, issued final on March 3rd, 1999, based on BAT instead of OAC rule 3745-17-11(C)(1) and (C)(2).
- b. The permittee shall limit VOC emissions from all VOC-containing materials (i.e., coatings, thinners, and any other additives) used by each EU of R007, R008, R009, R010, R011, R012, R013, R014, R015, and R016, which is a surface coating line for miscellaneous metal or plastic parts, by complying with the option one in OAC rule 3745-21-26(C)(1). Miscellaneous metal or plastic parts include, but not limited to, metal and plastic components of the types of products as well as the products themselves specified in OAC 3745-21-26(A)(2),
 - i. VOC content limitations based on low-VOC coatings as listed in sections b)(2)b.i.(a) – (e) below and the use of application methods specified in section c)(1) below.
 - (a) Metal parts and products maximum VOC content limitations [mass of VOC per volume of coating (excluding water and exempt compounds, as applied)].

Coating category	Air dried, pound VOC per gallon coating	Baked, pound VOC per gallon coating
General One-Component	2.8	2.3

Coating category	Air dried, pound VOC per gallon coating	Baked, pound VOC per gallon coating
General multi-component	2.8	2.3
Camouflage	3.5	3.5
Electric-Insulating Varnish	3.5	3.5
Etching Filler	3.5	3.5
Extreme High-Gloss	3.5	3.0
Extreme Performance	3.5	3.0
Heat-Resistant	3.5	3.0
High-Performance Architectural	6.2	6.2
High-Temperature	3.5	3.5
Metallic	3.5	3.5
Military Specification	2.8	2.3
Mold-Seal	3.5	3.5
Pan Backing	3.5	3.5
Prefabricated Architectural Multi-Component	3.5	2.3
Prefabricated Architectural One-Component	3.5	2.3
Pretreatment	3.5	3.5
Repair and Touch-up	3.5	3.0
Silicone Release	3.5	3.5
Solar-Absorbent	3.5	3.0
Vacuum Metallizing	3.5	3.5
Drum, New, Exterior	2.8	2.8
Drum, New, Interior	3.5	3.5
Drum, Reconditioned, Exterior	3.5	3.5
Drum, Reconditioned, Interior	4.2	4.2

- (b) Plastic parts and products maximum VOC content limitations (mass of VOC per volume of coating (excluding water and exempt compounds, as applied))

Coating Category	Pound VOC per gallon coating
General one-component	2.3
General multi-component	3.5
Electric-dissipating and shock-free	6.7
Extreme performance	3.5 (2-pack coatings)
Metallic	3.5
Military specification	2.8 (1-pack), 3.5 (2-pack)
Mold-seal	6.3
Multi-colored	5.7
Optical	6.7
Vacuum metallizing	6.7

- (c) Automotive/transportation and business machine plastic parts maximum VOC content limitations (mass of VOC per volume of coating (excluding water and exempt compounds, as applied))

Coating Category	Pound VOC per gallon coating
Automotive/Transportation Coatings*	
<u>High-Bake – Interior and Exterior Parts</u>	
Flexible primer	4.5
Non-Flexible primer	3.5
Basecoat	4.3
Clearcoat	4.0
Non-Basecoat/Clearcoat	4.3
<u>Low-Bake/Air Dried – Exterior Parts</u>	
Primer	4.8
Basecoat	5.0
Clearcoat	4.5

Coating Category	Pound VOC per gallon coating
Non-Basecoat/Clearcoat	5.0
<u>Low-Bake/Air Dried – Interior Parts</u>	5.0
<u>Touch-up and Repair</u>	5.2
Business Machine Coatings	
Primers	2.9
Topcoat	2.9
Texture coat	2.9
Fog coat	2.2
Touch-up and Repair	2.9

- For red, yellow, and black automotive coatings, except touch-up and repair coatings, the recommended limitation is determined by multiplying the appropriate limitation in above table by 1.15.

- (d) Pleasure craft surface coating maximum VOC content limitations (mass of VOC per volume of coating (excluding water and exempt compounds, as applied))

Coating Category	Pound VOC per gallon coating
Extreme high-gloss topcoat	5.0
High-gloss topcoat	3.5
Pretreatment wash primer	6.5
Finish primer/surfacer	3.5
High-build primer/surfacer	2.8
Antifouling sealer/tie coat	3.5
Aluminum substrate antifoulant	4.7
Other substrate antifoulant	3.3
All other pleasure craft surface coatings for metal or plastic	3.5

- (e) Motor vehicle materials maximum VOC content limitations (mass of VOC per volume of coating (excluding water and exempt compounds, as applied))

Coating Category	Pound VOC per gallon coating
Motor vehicle cavity wax	5.4
Motor vehicle sealer	5.4
Motor vehicle deadener	5.4
Motor vehicle gasket/gasket sealing material	1.7
Motor vehicle underbody	5.4
Motor vehicle trunk interior	5.4
Motor vehicle bedliner	1.7
Motor vehicle lubricating was/compound	5.8

- ii. If more than one emission limitation applies to a specific coating, then the least stringent emission limitation may be applied.
- iii. If a coating does not meet a specific coating category definition, then it can be assumed to be a general use coating and the VOC limit for “general” coating or “other” coating shall apply.
- iv. Metal parts coatings and coating operations subject to OAC rule 3745-21-09(S) are exempt from the limitations specified in section b)(2)b.i. above.
- v. The metal parts coatings and coating operations listed in OAC rule 3745-21-26(A)(3)(c) are exempt from the limitations specified in section b)(2)b.i. above and restrictions specified in section c)(1) below.
- vi. The plastic parts coatings and coating operations listed in OAC rule 3745-21-26(A)(3)(d) are exempt from the limitations specified in section b)(2)b.i. above.
- vii. For automotive or transportation and business machine plastic part coating, the types of coatings and operations listed in OAC rule 3745-21-26(A)(3)(e) are exempt from limitations specified in section b)(2)b.i. above.
- c. The emissions from each EU shall not exceed the following:
 - i. 7.3 TPY of OC emissions; and
 - ii. 2.41 TPY of PE.
- d. In accordance with 40 CFR § 60.722, the permittee shall not cause the discharge into the atmosphere from each EU in excess of the following for coating plastic parts for business machines, as defined in 40 CFR § 60.721(a):

- i. 1.5 kilograms of VOC's per liter of coating solids applied from prime coats;
 - ii. 1.5 kilograms of VOC's per liter of coating solids applied from color coats;
 - iii. 2.3 kilograms of VOC's per liter of coating solids applied from texture coats; and
 - iv. 2.3 kilograms of VOC's per liter of coating solids applied from touch-up coats.
 - e. All VOC emissions that are caused by coating applied in each EU in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats, regardless of the actual point of discharge of emissions into the atmosphere, shall be included in determining compliance with the emission limits in section b)(2)d above.
- c) Operational Restrictions
- (1) One, or a combination, of the following application methods shall be used for coating application, except exempt under OAC rule 3745-21-26(A)(3):
 - a. Electrostatic equipment.
 - b. High volume low pressure (HVLP) spray equipment.
 - c. Flow coating.
 - d. Roller coating.
 - e. Dip coating, including electrodeposition.
 - f. Airless spray.
 - g. Air-assisted airless spray.
 - h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
 - (2) The application method requirements specified in section c)(1) above do not apply to the following:
 - a. For metal parts coatings: touch-up coatings, repair coatings, and textured finishes.
 - b. For plastic parts coatings: airbrush operations using five gallons or less per year of coating; and
 - c. For pleasure craft surface coating operations: extreme high gloss coatings.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information monthly for each EU:
 - a. The name and identification number/code of each coating and cleanup material applied;



- b. The VOC/OC content, defined as “VOCc/OCc”, of each coating and cleanup material applied, in pounds per gallon, as applied;
- c. The number of gallons of each coating and cleanup material applied during the month, defined as “V”;
- d. The total monthly OC emissions, defined as “OCm”, shall be calculated by the following equation, in lbs/mon:

$$OCm \left(\frac{\text{lbs}}{\text{month}} \right) = \sum_r^z [(OCc)(V)]r$$

Where,

r = subscript denoting an individual coating or cleanup material employed during the month; and

z = total number of different coatings and cleanup materials employed during the month.

- e. The total monthly VOC emissions, defined as “VOCm”, shall be calculated by the following equation, in lbs/mon:

$$VOCm \left(\frac{\text{lbs}}{\text{month}} \right) = \sum_r^z [(VOCc)(V)]r$$

- f. The total volume of all coatings applied, defined as “TVc”, during the month, shall be calculated by the following equation, in gallons:

$$TVc \left(\frac{\text{gallons}}{\text{month}} \right) = \sum_i^n [(V)]i$$

Where,

i = subscript denoting an individual coating employed during the month; and

n = total number of different coatings employed during the month.

- (2) The synthetic minor permit 02-2102 application for these EUs, R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016, was evaluated based on the actual materials and the design parameters of the EUs’ exhaust system, as specified by the permittee. The “*Toxic Air Contaminant Statute*”, ORC 3704.03(F), was applied to these EUs for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one TPY using an air dispersion model such as AERMOD, ISCST3, or other Ohio EPA-approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, were compared to the 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 eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from the American Conference of Governmental Industrial Hygienists "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices" and in the following order of preference:
 - i. TLV shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value; the STEL is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. TLV is divided by 10 to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EUs, that is, X hours per day and Y days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:
$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{8}{Y} = 4 \frac{TLV}{XY} = MAGLC$$
- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant(s) or worst-case scenario:
 - i. Compound: Methyl isobutyl ketone (MIBK)
TLV (mg/m³): 204.82618
Maximum Hourly Emission Rate (lbs/hr): 9.5
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 195.3
MAGLC (µg/m³): 4,876.81
 - ii. Compound: Methanol
TLV (mg/m³): 262.0858896
Maximum Hourly Emission Rate (lbs/hr): 11.6
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 238.5
MAGLC (µg/m³): 6,240.140

The permittee has demonstrated that emissions of MIBK and methanol, from EUs R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016, are estimated to be less than eighty per cent of the MAGLC; and 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", ORC 3704.03(F).



- (3) Prior to making any physical changes to or changes in the method of operation of the EU/EUs that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-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 emissions of a new toxic air contaminant with a lower 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.
 - c. Physical changes to the EU/EUs or exhaust parameters (for example, increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change 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*, ORC 3704.03(F), has been documented. If each change meets the definition of a modification, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the EU, 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.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute* ORC 3704.03(F):
- 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 (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the EU/EUs to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that



was conducted to re-evaluate compliance due to a change made to the EU/EUs or the materials applied.

- (5) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-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.
- (6) In accordance with 40 CFR § 60.723(b), the permittee shall conduct a performance test each nominal 1-month period for each EU according to the following procedures when coating plastic parts of business machines:
- a. The permittee shall determine the composition of coatings by analysis of each coating, as received, using US EPA Method 24 or an acceptable alternative method, from data that has been determined by the coating manufacturer using US EPA Method 24 or an acceptable alternative method. Acceptable alternative methods to US EPA Method 24 include: ASTM D2369-20; ASTM D2697-22; and ASTM D6093-97 (all incorporated by reference; see 40 CFR § 60.17).
- b. The permittee shall determine the volume of coating and the mass of VOC used for dilution of coatings from company records during each nominal 1-month period. If a common coating distribution system serves more than one EU for coating business machines or serves both business machines and non-business machines spray coating EU(s), the permittee shall estimate the volume of coatings used at each EU by using procedures approved by the Administrator of US EPA
- i. The permittee shall calculate the volume-weighted average mass of VOC's in coatings emitted per unit volume of coating solids applied (N) at each coating operation [i.e., for each type of coating (prime, color, texture, and touch-up) used] during each nominal 1-month period for each EU. Each 1-month calculation is considered a performance test. Except as provided in section d)(6)b.iii below, N will be determined by the following procedures:
- (a) Calculate the mass of VOC's used ($M_o + M_d$) for each coating operation during each nominal 1-month period for each EU by the following:

$$(M_o + M_d) = \sum_{i=1}^n (L_{ci} D_{ci} W_{oi}) + \sum_{j=1}^m (L_{dj} D_{dj})$$

where:

M_o = the proportion of VOC's consumed, kilograms;

M_d = the mass of diluents VOC's consumed, kilograms;

L_{ci} = the volume of each coating consumed, as received, liters;

D_{ci} = the density of each coating as received, kilograms per liter;



W_{0i} = the proportion of VOC's in each coating, as received, fraction by weight;

D_{dj} = the density of each diluents of VOC, kilograms per liter;

L_{dj} = the volume of each diluents VOC added to coatings, liters

n = the total number of coatings of each type used during each nominal 1-month period;

i = subscript denoting an individual coating;

m = the total number of different diluents VOC's used during each nominal 1-month period; and

j = subscript denoting an individual diluents VOC's.

- (b) Calculate the total volumes of coating solids consumed (L_s) in each nominal 1-month period for each coating operation for each EU by the following equation:

$$L_s = \sum_{i=1}^n (L_{ci} V_{si})$$

where:

L_s = the volume of coating solids consumed, liters;

V_{si} = the proportion of solids in each coating, as received, fraction by volume;

- (c) Select the appropriate transfer efficiency (T) from Table 1 of 40 CFR Part 60, Subpart TTT, for each type of coating applications equipment used at each coating operation.

- (d) Where more than one application method is used within a single coating operation, the permittee shall determine the volume of each coating applied by each method through a means acceptable to the US EPA and compute the volume-weighted average transfer efficiency by the following equation:

$$T_{avg} = [\sum_{i=1}^n \sum_{k=1}^p (L_{cik} V_{sik} T_k)] / L_s$$

where:

T_{avg} = the volume-weighted average transfer efficiency for a coating operation (fraction);

k = subscript denoting an individual application method; and

p = the total number of different application methods used.

- (e) Calculate the volume-weighted average mass of VOC's emitted per unit volume of coating solids applied (N) during each nominal 1-month

period for each coating operation for each EU by the following equation:

$$N = (M_o + M_d) / (L_s T_{avg})$$

- ii. Where the volume-weighted average mass of VOC's emitted to the atmosphere per unit volume of coating solids applied (N) is less than or equal to limitations in section b)(2)d above, the EU is in compliance.
 - iii. If each individual coating used by an EU has a VOC content (kg VOC/l of solids), as received, which when divided by the lowest transfer efficiency at which the coating is applied for each coating operation results in a value equal to or less than the limitations in section b)(2)d above, the EU is in compliance provided that no VOC's are added to the coatings during distribution or application.
- (7) The permittee, in accordance with 40 CFR § 60.724(d), shall maintain at the facility, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each coating operation of each EU as specified in 40 CFR § 60.7(d) and 40 CFR § 60.724a(g).
- (8) In accordance with 40 CFR § 60.724(g), any records required to be maintained by 40 CFR Part 60, Subpart TTT that are submitted electronically via the EP's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for the permittee to make records, data, and reports available upon request to a delegated air agency or the US EPA as part of an on-site compliance evaluation.
- (9) Work practice standards, in accordance with OAC rule 3745-21-26(E):
- Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but are not limited to, the following:
- a. Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - b. Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - c. Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - d. Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.
 - e. Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

- (10) The permittee shall keep the following records each day for each EU of R007, R008, R009, R010, R011, R012, R013, R014, R015, or R016:
 - a. The name/identification number and the type/coating category of each coating applied;
 - b. The type of substrate material; and
 - c. The daily volume weighted average VOC content, in lbs/gallon, for all coating materials employed.
 - (11) In accordance with OAC rule 3745-21-26(F)(1), compliance with the VOC emission limitations specified in section b)(2)b. above are based upon a weighted average by volume of all coating materials employed in each EU in any one day. The VOC contents and densities of the coating materials subject this rule shall be determined in accordance with OAC rule 3745-21-10(B).
 - (12) In accordance with OAC rule 3745-21-26(F)(2), the averaging of VOC emissions over two or more coating lines in order to demonstrate compliance with an applicable emission limitation (i.e., crossline averaging) is prohibited.
 - (13) In accordance with OAC rule 3745-21-26(G)(3), all records made to determine compliance with OAC rule 3745-21-26 shall be maintained for five years from the date such record is created and shall be made available to director or the appropriate Ohio EPA DO/LAA within ninety (90) days of a request.
- e) Reporting Requirements
- (1) The permittee shall include 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, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, EU(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (2) The permittee, in accordance with 40 CFR §60.724(b), shall:
 - a. Report the volume-weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each EU during each nominal 1-month period in which the EU is not in compliance with the applicable emission limits specified in section b)(2)d. above. Reports of non-compliance shall be submitted on a quarterly basis, occurring every 3 months following the initial report; and
 - b. Submit statements that each EU has been in compliance with the application emission limits specified in section b)(2)d. above during each nominal 1-month period. Statements of compliance shall be submitted on a semiannual basis.

These reports shall be submitted, in accordance with 40 CFR §60.724a(c), as a portable document format (PDF) upload not later than 10 days after the end of the periods specified in e)(2)a and e)(2)b.



- (3) The permit shall submit all performance test reports, quarterly reports of non-compliance, and semiannual statements in accordance with 40 CFR §60.724(f).
 - (4) In accordance with OAC rule 3745-21-26(l)(6)(b), the permittee shall submit a compliance certification by notifying the appropriate Ohio EPA DO/LAA in writing within thirty (30) days following the first documented achievement of compliance with each of the requirements. The compliance certification shall provide the following:
 - a. A description of the requirements;
 - b. A description of the records that document continuing compliance;
 - c. The results of any records that document continuing compliance, including calculations; and
 - d. A statement by the permittee as to whether the EU has complied with the requirements.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these T&C shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VE shall not exceed 20% opacity as a 6-minute average, except as provided in the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible PE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

0.551 lb/hour of PE from each EU.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the worst case emission rate by using the following equation:

$$EP = (MCSUR)(1 - TE)(1 - CE)$$

where:

EP = particulate emission rate, in pound per hour;

MCSUR = maximum coating solids usage rate, in pound per hour;

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

CE = control efficiency of the control equipment.

If required, compliance with the hourly limitation shall be demonstrated based upon the methods and procedures specified in OAC rule 3745-17-03(B)(10).



c. Emission Limitation:

2.41 TPY of PE from each EU

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the short-term allowable PE limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitations:

7.3 TPY of OC emissions from each EU.

Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section d)(1)d above, and shall be the sum of the year, in tons.

e. Emission Limitation:

In accordance with 40 CFR §60.722, the permittee shall not cause the discharge into the atmosphere from each EU in excess of the following for coating plastic parts for business machines, as defined in 40 CFR §60.721(a):

- i. 1.5 kilograms of VOC per liter of coating solids applied from prime coats;
- ii. 1.5 kilograms of VOC per liter of coating solids applied from color coats;
- iii. 2.3 kilograms of VOC per liter of coating solids applied from texture coats; and
- iv. 2.3 kilograms of VOC per liter of coating solids applied from touch-up coats.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(6) and d)(7) above.

f. Emission Limitation:

VOC content limitations, in accordance with OAC rule 3745-21-26, for surface coating of miscellaneous metal and plastic parts, as specified in section b)(2)b. above.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(10), d)(11), and d)(12) above, and the methods and procedures specific in OAC rule 3745-21-10(B).



- (2) In accordance with 40 CFR §60.725(a), the reference methods in Appendix A to 40 CFR Part 60, except as provided under 40 CFR § 60.8(b), shall be used to determine compliance with the emission limitations in section b)(2)d. above as follows:
 - a. US EPA Method 24 for determination of VOC content of each coating as received; and
 - b. For US EPA Method 24, the sample must be at least a 1-liter sample in a 1-liter container.
 - (3) In accordance with 40 CFR §60.725(b), other methods may be used to determine the VOC content of each coating if approved by the US EPA Administrator before testing. Acceptable alternative methods to Method 24 include: ASTM D2369-20; ASTM D2697-22; and ASTM D6093-97 (all incorporated by reference; see 40 CFR § 60.17).
- g) Miscellaneous Requirements
- (1) EUs R007, R008, R0098, R010, R011, R012, R013, R014, R015, and R016 are not equipped with control devices for OC emissions. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable to these EUs.