10/29/2026

Mr. Benjamin Price
Goodrich Corp
101 Waco Street
Troy, OH 45373

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

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

Facility ID: 0855140039
Permit Number: P0141261
Permit Type: OAC Chapter 3745-31 Modification
County: Miami

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***. The permit can also be commented on and accessed electronically at: ***https://ohioepa.commentinput.com***. Search by entering the permit # (P0141261) in the "Search Projects" search box and selecting “Review Document” or “Draft Permit.” Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) 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

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

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 Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
RAPCA; Indiana

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 OAC Chapter 3745-31 Modification

Goodrich Corp
101 Waco St
Troy, OH 30640

ID#: P0141261
Date of Action: 10/29/2026
Permit Desc: Chapter 31 Modification to install a second paint booth to the existing coating line.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit P0141261 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

   ☒ Synthetic Minor Determination

   ☐ Netting Determination

2. Source Description:

   Goodrich Corporation (Goodrich) operates an aerospace parts manufacturing facility in Troy, Ohio specializing in the coating and assembly of airplane wheel and brake systems for commercial and defense sectors. The manufacturing operations consist of a variety of miscellaneous metal and plastic parts coating operations.

   Goodrich has submitted an application to modify a previously installed emissions unit, K002. The modification includes adding an additional booth to the coating line and an increase in volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions.

3. Facility Emissions and Attainment Status:

   Goodrich is located in Troy, Ohio (Miami County) which is classified as attainment with the current National Ambient Air Quality Standards for all criteria pollutants. Based on maximum operations for the miscellaneous metal parts coating operations currently permitted and identified as Ohio EPA emissions units K001, K002, K003, R001 and R005 the uncontrolled potential hazardous air pollutant (HAP) emissions exceeds the Title V major source threshold.

   Goodrich was previously issued a federally enforceable permit to install and operate (FEPTIO) establishing facility-wide synthetic minor limits for HAPs of 9.9 tons for any individual HAP and 24.9 tons for the combination of all HAPs, on a rolling 12-month basis.

4. Source Emissions:

   Goodrich is not requesting an increase in HAP emissions and the facility wide limits will remain at 9.9 tons per year of any individual HAP and 24.9 tons per year of all HAPs combined, each on rolling 12-month emissions basis.

5. Conclusion:

   By limiting the combined HAP emissions to less than 9.9 tons for any individual HAP and 24.9 tons for any combination of HAPs on a rolling 12-month basis and will preclude compliance with Title V major source operating permit requirements.

6. Please provide additional notes or comments as necessary: None

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

Pollutant	Tons Per Year
HAP (Individual)	9.9
HAP (Combined)	24.9

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate

for

Goodrich Corp

Facility ID:	0855140039
Permit Number:	P0141261
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/29/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control

Permit-to-Install and Operate

for

Goodrich Corp

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Authorization

Facility ID:	0855140039
Application Number(s):	A0082448A0082448
Permit Number:	P0141261
Permit Description:	Chapter 31 Modification to install a second paint booth to the existing coating line.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$150.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/29/2026
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:

Goodrich Corp
101 Waco St
Troy, OH 30640

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

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

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: P0141261

Permit Description: Chapter 31 Modification to install a second paint booth to the existing coating line.

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

Emissions Unit ID:	**K002**
Company Equipment ID:	M2421 Spray Paint Booth
Superseded Permit Number:	P0132091
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_{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/m3 = 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/m3 = 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_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_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/m3 = 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 Regional Air Pollution Control Agency 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. through B.5.

2. The facility wide emissions of Hazardous Air Pollutants (HAP), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons for any individual HAP and 24.9 tons on for the combination of all HAPs on a rolling 12-month basis. The emissions units at the facility have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month emissions rate, upon issuance of this permit.

3. The permittee shall collect and record the following information each month for any coating, thinner and cleanup materials used at the facility that contain any HAP:

   a) The identification of each coating, thinner and cleanup material employed;

   b) The individual (HAP) content for each HAP of each coating, thinner and cleanup material, in pounds of individual HAP per gallon, as applied;

   c) The volume, in gallons, of each coating, thinner and cleanup material employed;

   d) The total individual HAP emissions from all coating, thinner and cleanup materials employed, in tons per month [for each HAP, the sum of B.3.b) times B.3.c) for each coating, thinner and cleanup material];

   e) The total combined HAPs emissions from all coating, thinner and cleanup materials employed, in tons per month [the sum of all individual HAP emissions from B.3.d) for each coating, thinner and cleanup material];

   f) The total individual HAP emissions from all coating, thinner and cleanup materials employed, in tons, for the previous 12-months [the sum of the values calculated according to B.3.d) for the previous 12-months].

   g) The total combined HAPs emissions from all coating, thinner and cleanup materials employed, in tons, for the previous 12-months [the sum of the values calculated according to B.3.e) for the previous 12-months].

4. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations that restrict the potential to emit for HAPs and have been detected by the monitoring, record keeping and/or testing requirements in this permit. The reports must include identification of:

   a) all exceedances of the rolling, 12-month emission limitation for individual HAP;

   b) all exceedances of the rolling, 12-month emission limitation for the combination of all HAPs;

c) the probable cause of each deviation (excursion);

d) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

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

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

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

5. Compliance with the emission limitations in B.2 shall be determined in accordance with the following methods:

a) Emissions Limitation:

Individual HAP emissions from this facility shall not exceed 9.9 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.3 for individual HAP.

b) Emissions Limitation:

The combined emissions of all HAPs from this facility shall not exceed 24.9 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.3 for the combination of all HAPs.

6. 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. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

7. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart HHHHHH, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may

be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency

C. Emissions Unit Terms and Conditions

1. K002, M2421 Spray Paint Booth

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Coating line with 2 Spray Booths and Filtration Systems

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)e and d)(3).

(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)b.

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(A)(3) ORC 3704.03(T)	Compliance with the requirements of this rule are achieved by compliance with OAC rule 3745-21-09(U)(1)(c). See b)(1)c.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See Sections B.2. Through B.5.
c.	OAC rule 3745-21-09(U)(1)(c)	Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(4) through d)(8).
e.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. None.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line and shall maintain this information at the facility for a period of three years:

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

b. The mass of VOC per volume of each coating, excluding water and exempt solvents, as applied;

c. The volume of each coating, excluding water and exempt solvents, as applied; and

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

(2) The permittee shall collect and record the following information on a monthly basis for the VOC containing materials applied in this EU:

a. The name and identification number of each VOC containing material.

b. The volume, in gallons, of each VOC containing material employed;

c. The VOC content of each VOC containing material employed, in pounds per gallon;

d. The total VOC emissions from all VOC containing materials applied during the month, i.e., the product of the "b" times "c";

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the EU.

(3) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because K002's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY, may require the permittee to apply for and obtain a new FEPTIO.

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

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

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

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

a. the date of the inspection;

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

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

d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

(1) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA DO/LAA within 45 days after the exceedance occurs.

(2) 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.

f) Testing Requirements

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

a. Emission Limitation

Coatings applied shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume weighted average

Applicable Compliance Method

Compliance shall be based on the recordkeeping requirements of d)(1) and (f)(2).

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

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

b. 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

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

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

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as $C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

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_M = 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; and

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

Where:

V_{VW} = 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; and

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.

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.

g) Miscellaneous Requirements

(1) None.