11/19/2026

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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

Cindy Baker
B-Way Corporation
1515 W. 22nd Street
Suite 1100
Oak Brook, IL 60523

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

Facility ID: 1431340460
Permit Number: P0140826
Permit Type: Initial Installation
County: Hamilton

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 # (P0140826) 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

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237

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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control

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

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 Initial Installation

B-Way Corporation
8200 Broadwell Road
Cincinnati, OH 45244

ID#: P0140826
Date of Action: 11/19/2026
Permit Desc: Initial FEPTIO for a metal parts coating line with an attached 95% control efficiency incinerator requesting synthetic minor limitations to avoid TV for VOC and HAPs.

The permit and complete instructions for requesting information or submitting comments may be obtained at: https://ohioepa.commentinput.com - Search by entering permit P0140826 in the "Search Projects" search box.

Environmental Protection Agency

Draft Permit-to-Install and Operate
B-Way Corporation
Permit Number: P0140826
Facility ID: 1431340460
Effective Date: To be entered upon final issuance

Permit Strategy Write-Up

1. Check all that apply:

   ☒ Synthetic Minor Determination

   ☐ Netting Determination

2. Source Description:

   B-Way Corporation is a miscellaneous metal parts coating facility in Hamilton County, OH. The facility is a synthetic minor source of VOC and HAPs.

   B-Way is proposing an installation of a new conventional coating line with a built-in 95% control efficiency RTO incinerator (K059). B-Way calculates that the uncontrolled facility-side VOC potential to emit (PTE) after this project would be 410 TPY, and the PTE after controls would be 56.91 TPY

3. Facility Emissions and Attainment Status:

   B-Way is located in Hamilton County, which is in attainment for all NAAQS pollutants. The facility is designated as synthetic minor for VOC and HAPs. Unrestricted VOC emissions are greater than 100 TPY. Current facility-wide requirements limit each of these emissions to 99.0 TPY.

4. Source Emissions:

   This permitting action (P0140826) is an initial installation permit for one new conventional coating line (K059). The facility will continue to operate under the existing facility-wide synthetic minor emissions limitations for VOC and HAPs, including new federally enforceable and voluntary requirements on the operation of the 95% control efficiency rated RTO incinerator.

5. Conclusion:

   Sufficient monitoring, recordkeeping, reporting, and testing requirements are included in the permit terms to demonstrate compliance with the facility-wide federally enforceable limitations. It is recommended that this permit be issued draft for public comment and to ensure ongoing enforceability of the permit terms and conditions.

6. Please provide additional notes or comments as necessary:

   B-Way requested to remain FEPTIO and adhere to the synthetic minor limits established in previous permits.

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

Pollutant	Tons Per Year
VOC	99.0
Individual HAP	9.9
Total HAPs	24.9

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
B-Way Corporation

Facility ID:	1431340460
Permit Number:	P0140826
Permit Type:	Initial Installation
Issued:	11/19/2026
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

B-Way Corporation

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Authorization

Facility ID:	1431340460
Application Number(s):	A0082436, A0081962A0082436, A0081962
Permit Number:	P0140826
Permit Description:	Initial FEPTIO for a metal parts coating line with an attached 95% control efficiency incinerator requesting synthetic minor limitations to avoid TV for VOC and HAPs.
Permit Type:	Initial Installation
Permit Fee:	$300.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	11/19/2026
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:

B-Way Corporation
8200 Broadwell Road
Cincinnati, OH 45244

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

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237
(513)946-7777

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: P0140826

Permit Description: Initial FEPTIO for a metal parts coating line with an attached 95% control efficiency incinerator requesting synthetic minor limitations to avoid TV for VOC and HAPs.

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

Emissions Unit ID:	**K059**
Company Equipment ID:	C-6 Coater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM_{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 Southwest Ohio Air Quality 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) 2., 3., 4., 5., and 6.

2. The total allowable emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K041 (Conventional Coater 2), K046 (Conventional Coater 8), K049 (UV-1, Printing Press with Coater UV-1), K050 (Conventional Coater 9 with Incinerator), K051 (Conventional Coater 10 with Incinerator), K052 (UV-2, Printing Press with Coater), K059 (Conventional coater 11 with incinerator), all de minimis emissions units (as defined in OAC rule 3745-15-05), and other air contaminant sources exempt from the requirement to obtain a PTI pursuant to OAC rules 3745-31-03 and 3745-31-30 installed prior to or subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

3. The total allowable emissions of VOCs, as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K041, K046, K049, K050, K051, K052, K059, all de minimis emissions units (as defined in OAC rule 3745-15-05), and other air contaminant sources exempt from the requirement to obtain a PTI pursuant to OAC rules 3745-31-03 and 3745-31-30 installed prior to or subsequent to the issuance of this permit, combined, shall not exceed 96.0 TPY. Compliance with the VOC limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

4. The permittee shall collect and record the following information each month for the emissions units identified in 2. and 3.

   a) The name and identification number for each coating and cleanup material employed;

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

   c) The total combined HAP content of each coating and cleanup material in lbs of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from b)];

   d) The total VOC content of each coating and cleanup material in lbs per gallon of material, as applied;

   e) The number of gallons of each coating and cleanup material employed;

   f) The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in lbs or tons per month [for each HAP the sum of b) times e) for each coating and cleanup material];

   g) The total combined HAP usage from all coatings and cleanup materials employed, in lbs or tons per month [the sum of c) times e) for each coating and cleanup material];

h) The total combined VOC usage from all coatings and cleanup materials employed, in lbs or tons per month [the sum of d) times e) for each coating and cleanup material];

i) The updated rolling, 12-month summation of usage for each individual HAP, in lbs or tons. This shall include the information for the current month and the preceding eleven calendar months;

j) The updated rolling, 12-month summation of usage for total combined HAPs, in lbs or tons. This shall include the information for the current month and the preceding eleven calendar months; and

k) The updated rolling, 12-month summation of usage for VOCs, in lbs or tons. This shall include the information for the current month and the preceding 11 calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

5. 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, record keeping and/or testing requirements in this permit:

emission limitations specified in Sections B.2. and B.3.

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) 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 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).

6. Compliance with the emission limitations in B.2. and B.3 of these terms and conditions shall be determined in accordance with the following methods:

a) <u>Emission Limitations:</u>

9.9 TPY of any single HAP and 24.9 TPY of combined HAPs, based upon a rolling, 12-month summation of the monthly emissions for the emissions units listed in B.2.

<u>Applicable Compliance Method:</u>

Compliance with the HAP emission limitations shall be demonstrated by the recordkeeping requirements specified in B.4.

b) Emission Limitation:

96.0 TPY of VOCs, based upon a rolling, 12-month summation of the monthly emissions for the emissions units listed in B.3.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be demonstrated by the record keeping requirements specified in B.4.

7. The Ohio EPA has determined that this facility operates affected sources that may be subject to the requirements of 40 CFR Part 63, Subpart HHHHHH, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Ohio EPA is not accepting the delegation authority to implement and enforce the area source NESHAP standard. The area source NESHAP standard is implemented and enforced by U.S. EPA, Region 5. The promulgated version of this NESHAP standard and the 40 CFR 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 Ohio EPA, District Office or Local Air Agency.

   The following affected sources may be subject to the area source requirements of this NESHAP standard:

   Emissions units K059.

8. The Ohio EPA has determined that this facility operates affected sources that may be subject to the requirements of 40 CFR Part 63, Subpart XXXXXX, the National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. Ohio EPA is not accepting the delegation authority to implement and enforce the area source NESHAP standard. The area source NESHAP standard is implemented and enforced by U.S. EPA, Region 5. The promulgated version of this NESHAP standard and the 40 CFR 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 Ohio EPA, District Office or Local Air Agency.

   The following affected sources may be subject to the area source requirements of this NESHAP standard:

   Emissions units K059.

C. Emissions Unit Terms and Conditions

1. K059, C-6 Coater

Operations, Property and/or Equipment Description:

Ingor Coating Line with RTO

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)d., d)(8) – d)(11) and e)(2)b.

(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)(2)c., b)(2)d., b)(2)e., e)(3), f)(1)a., f)(1)b., f)(1)d., and f)(2).

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)	Install a recuperative thermal oxidizer with a design control efficiency of at least 95% destruction and removal efficiency of VOC emissions.
b.	OAC rule 3745-31-05(D) *Synthetic Minor for VOC and HAPs to Avoid Title V Applicability*	See Section B.2. through B.6. VOC emissions shall not exceed 2.14 lbs/hr. The recuperative thermal oxidizer shall achieve a destruction and removal efficiency of at least 95% of VOC emissions. See b)(2)c., b)(2)d., and b)(2)e.
c.	OAC rule 3745-21-26 *RACT for surface coating of miscellaneous metal and plastic parts*	Add-on air pollution control equipment and VOC control efficiency requirements in OAC rule 3745-21-26(C)(3); and Work Practice Standards in OAC rule 3745-21-26(E). See b)(2)a., b)(2)b., c)(2), d)(3), d)(4), d)(5), e)(4), f)(1)c., and f)(2).

d.	ORC 3704.03(F)(4)	See d)(8) – d)(11) and e)(2)b.

(2) Additional Terms and Conditions

a. The permittee has elected to comply with the requirements of OAC Rule 3745-21-26 in "Option three" from OAC rule 3745-21-26(C) as outlined in b)(2)b. below. Application A0076953 for a PTIO under rule 3745-31-02 of the Administrative Code fulfilled the notification requirements of OAC rule 3745-21-26(I)(4). For compliance certification requirements, see e)(4) below.

b. Pursuant to OAC rule 3745-21-26(C)(3) for the *surface coating of miscellaneous metal or plastic parts***,** the permittee shall comply with the rule by using add-on air pollution control equipment that achieves a minimum overall VOC control efficiency of 90%.

c. All of the captured VOC emissions from this EU shall be vented to a recuperative TO that shall meet the monitoring and recordkeeping requirements of this permit, when the EU is operating.

d. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed.

e. The permanent total enclosure serving this EU shall be maintained under negative pressure as required in this permit whenever the EU is in operation and shall capture all of the VOC emissions from this EU. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening (NDO) to be into the enclosure.

c) Operational Restrictions

(1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water or psia) established during the most recent emission test that demonstrated the EU to be in compliance, whenever the EU is in operation.

(2) 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information:

a. the date and description of any maintenance and/or repairs performed on the recuperative thermal oxidizer; and

b. a copy of the manufacturer's recommended maintenance procedures for the recuperative thermal oxidizer.

These records shall be maintained at the facility and shall be made available to the appropriate Ohio EPA DO/LAA upon request.

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the recuperative TO when the EU is operating, including periods of startup and shutdown. The permittee shall record the combustion temperature on continuous basis. The monitoring equipment shall be installed, calibrated, operated and maintained per the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than five years.

(3) The permittee shall continuously monitor the combustion temperature of the recuperative thermal oxidizer pursuant to OAC rule 3745-21-26(F)(3).

(4) The permittee shall maintain records of the key operating parameters for the recuperative thermal oxidizer, including but not limited to the following, pursuant to OAC rule 3745-21-26(G)(2):

a. On a daily basis, the combustion temperature.

b. Daily hours of operation.

c. All maintenance performed including the date and type of maintenance.

(5) 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 the director or any authorized representative of the director within ninety days of a request.

(6) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of

the permanent total enclosure when the EU is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. All three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential specified in this permit, as a three-hour average; and

b. A log or record of downtime for the capture (collection) system when the EU was in operation.

(7) Whenever the monitored average combustion temperature within the recuperative TO deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA DO/LAA. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the

allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(8) The FEPTIO application for EU K059 was evaluated based on the actual materials and the design parameters of the EU's exhaust system, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to this EU 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 emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3, or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in 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 EU (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. The TLV is divided by 10 to adjust the standard from the working population to the general public.

c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EU, 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:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4\frac{TLV}{XY} = MAGLC$$

e. The following summarizes the results of dispersion modeling for the significant toxic contaminant (emitted at 1 TPY or more) or *worst-case* scenario:

   i. Toxic Contaminant: glycol ethers

   TLV (mg/m^3): 18

   Maximum Hourly Emission Rate (lbs/hr): 1.25

   Predicted One-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 24.69

   MAGLC ($\mu g/m^3$): 429

The permittee has demonstrated that emissions of glycol ethers, from EU K059, are calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the EU 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 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.

(10) 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 in accordance with 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 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 or the materials applied.

(11) 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.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual PER to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

a. The permittee shall identify in the annual PER the following information concerning the operations of the TO during the 12-month reporting period for this EU:

i. Each period of time (start time and date, and end time and date) when the average combustion temperature within the recuperative TO was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

ii. Any period of time (start time and date, and end time and date) when the EU was operating, and the captured process emissions were not vented to the recuperative TO;

iii. Each incident of deviation described in “i.” or “ii.” above where a prompt investigation was not conducted;

iv. Each incident of deviation described in “i.” or “ii.” above where prompt corrective action, that would bring the EU into compliance and/or the

temperature within the recuperative TO into compliance with the acceptable range, was determined to be necessary and was not taken; and

v. Each incident of deviation described in "i." or "ii." above where proper records were not maintained for the investigation and/or the corrective action(s).

b. The permittee shall include any changes made to a parameter or value entered into 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 in the annual PER. If no changes to the emissions, EU, or the exhaust stacks have been made, then the report shall include a statement to this effect.

(3) 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, record keeping and/or testing requirements in this permit:

i. Any exceedance of the facility-wide rolling, 12-month HAP emission limitations in Section B.2.; and

ii. Any exceedance of the facility-wide rolling, 12-month VOC emissions limitation in Section B.3.

iii. Each period of time (start time and date, and end time and date) when the average combustion temperature within the recuperative TO was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

iv. Any period of time (start time and date, and end time and date) when the EU was operating, and the captured process emissions were not vented to the recuperative TO;

v. All three-hour blocks of time, when the EU was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential, at any NDO, as required in this permit; and

vi. All periods of time during which an access door and/or window, not qualifying as an NDO, was left open during operations.

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) 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 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).

(4) Compliance Certification

The owner or operator of a coating line that is subject to OAC rule 3745-21-26 shall notify the Ohio EPA DO/LAA in writing within 30 days following the completion of any of the following:

a. The completion of installation and initial use of a VOC emission control system for EU K059.

b. The completion of installation and initial use of any monitoring devices required under OAC rule 3745-21-26(C)(3) for EU K059.

c. The completion of any compliance testing conducted to demonstrate compliance with the applicable control requirements found in b)(2)b., above.

The compliance certification [pursuant to OAC rule 3745-21-26(I)(6)(a)] shall provide the following, where applicable:

d. a description of the requirements;

e. a description of the VOC emission control system;

f. a description of the monitoring devices;

g. a description of the records that document continuing compliance;

h. the results of any compliance tests, including documentation of test data;

i. the results of any records that document continuing compliance, including calculations; and

j. a statement by the owner or operator as to whether the subject coating line has complied with the requirements.

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. <u>Control Requirement:</u>

Install a recuperative thermal oxidizer with a design control efficiency of at least 95% destruction and removal efficiency of VOC emissions.

The recuperative thermal oxidizer shall achieve a destruction and removal efficiency of at least 95% of VOC emissions.

<u>Applicable Compliance Method:</u>

Compliance shall be based on Inghor, S.A. design specification sheet for the Recuperative Thermal Oxidizer Project, Type: ITR.12 / Equipment ID: 5133, dated August 6, 2026, as supplied in the application for PTIO P0140826.

The permittee shall confirm the design destruction and removal efficiency through emission testing performed as specified in f)(2) below.

b. Emissions Limitation:

100% capture of VOC emissions

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emissions testing for this EU in accordance with the following requirements:

i. The emissions testing shall be conducted within 180 days after initial startup of the coating line.

ii. The emissions testing shall be conducted to demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure. The following test methods shall be employed:

(a) Method 204 from 40 CFR Part 51 Appendix M; and

(b) Method 2 from 40 CFR Part 60, Appendix A.

iii. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average FV of the air flow through each NDO.

iv. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the *enclosure* through a forced makeup air duct, using Method 2. The FV shall be calculated using the following equation:

$FV = (Q_o - Q_i) / A_n$

where:

Q_o is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Q_i is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct and is equal to zero if there is no forced makeup air into the enclosure; and

A_n is the total area of all NDOs in the enclosure.

v. If the average FV is measured at greater than 500 fpm (9,000 m/h), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average FV is measured at less than 500 fpm, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of one hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke

tubes, or tracer gases. All closed access doors and windows that are not considered NDOs shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

vi. The permittee shall also measure and record the following information for the permanent total enclosure and each NDO:

(a) The diameter of each NDO;

(b) The distance measured from each NDO to each VOC emitting point in the process;

(c) The distance measured from each exhaust duct or hood in the enclosure to each NDO;

(d) The total surface area of each NDO and the surface area of the enclosure's four walls, floor, and ceiling; and

(e) The ratio of the total surface area (sum) of all NDOs to the total surface area of the permanent total enclosure.

vii. The testing shall be conducted while the EU is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA.

viii. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an intent to test (ITT) notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU operating parameters, the time(s) and date(s) of the test(s) and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA's refusal to accept the results of the emissions test(s).

ix. Personnel from the appropriate Ohio EPA DO/LAA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

x. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA.

c. Control Requirement:

Pursuant to OAC rule 3745-21-26(C)(3) for the *surface coating of miscellaneous metal or plastic parts*, the permittee shall comply with the rule by using add-on air pollution control equipment that achieves a minimum overall VOC control efficiency of 90%.

Applicable Compliance Method:

Compliance with the minimum overall VOC control efficiency shall be demonstrated through emission testing performed as specified in f)(2) below.

Additional testing of a subject coating line and its VOC add-on air pollution control equipment in accordance with OAC rule 3745-21-26(F)(4) may be required by the director to ensure continued compliance.

d. Emission Limitation:

VOC emissions shall not exceed 2.14 lbs/hr.

Applicable Compliance Method:

The hourly controlled potential VOC emission rate for emissions unit K059 were determined based on the following equation from the permittee-supplied information in the application for PTIO P0140826 as submitted on July 1, 2026:

VOC = [(4.8 lbs VOC/gallon maximum VOC content for coatings) x (8.9 gallons/hour maximum coating usage)] x (1-0.95 destruction efficiency for recuperative TO) = 2.14 lbs/hr.

Compliance with the hourly VOC emission limitation shall be demonstrated through emission testing performed as specified in f)(2) below.

(2) The permittee shall conduct, or have conducted, emissions testing for this EU in accordance with OAC rule 3745-31-05(A)(3) / ORC 3704.03(T), OAC rule 3745-31-05(D), OAC rule 3745-21-26, and the following requirements:

a. The emission testing shall be conducted within 180 days after initial startup of the coating line.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation of at least 95% destruction and removal efficiency of VOC emissions in b)(1)a. and b)(1)b.; the minimum overall VOC control efficiency of 90% in b)(2)b.; and the hourly VOC emission limitation of 2.14 lbs/hr in b)(1)b.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s):

For VOC: Method 25 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency per U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

e. The control efficiency (that is, the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined per the test methods and procedures specified in OAC rule 3745-21-10 or an alternative test protocol approved by Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and the total concentration, and on a consideration of the potential presence of interfering gases.

f. During the emissions testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under *worst case* conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe *worst case* operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute *worst case*. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

To satisfy the requirements of OAC rule 3745-21-26(F)(4), the affected source shall be run at typical operating conditions and flow rates compatible with scheduled production during any emission testing.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU operating parameters, the time(s) and date(s) of the test(s) and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).

h. Personnel from the appropriate Ohio EPA DO/LAA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA DO/LAA.

g) Miscellaneous Requirements

(1) None.