



09/21/2026

Thomas Kelley
Freeman Enclosure System
4160 Half Acre Road
Batavia, OH 45103

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

Facility ID: 1413020501
Permit Number: P0132459
Permit Type: Renewal
County: Clermont

No	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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (P110) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search / Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

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*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Renewal

Freeman Enclosure System
4160 Half Acre Road
Batavia, OH 45103

ID#: P0132459

Date of Action: 09/21/2026

Permit Desc: Freeman Enclosure System designs and manufactures enclosure systems, fuel tanks, and accessory equipment for on-site power generation. The facility has three emission units, K001, K002 and K004, with particulate filters which are used to coat miscellaneous metal parts. No changes have been requested. The facility revised calculations to better represent the actual emissions for the facility when

The permit can be accessed electronically and comments may be submitted at: <https://ohioepa.commentinput.com> - Search by entering the permit # P0132459 in the "Search Projects" search box.



Permit Strategy Write-Up

1. Check all that apply:
 - ☐ Synthetic Minor Determination
 - ☐ Netting Determination
2. Source Description: Freeman Enclosure System manufactures steel enclosures for commercial diesel engine (primarily Cummins) generator sets.
3. Facility Emissions and Attainment Status: The facility has three emission units (paint booths) designated K001, K002 and K004. Facility is located in Clermont County which is attainment for all criteria pollutant.
4. Source Emissions: This FEPTIO is a renewal permit for all three emission units. Emissions consist of PM and VOC
5. Conclusion: Permit should be issued to draft due to the applicability of OAC rule 3745-21-26 to the facility.
6. Please provide additional notes or comments as necessary:
None
7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	20



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Freeman Enclosure System

Facility ID:	1413020501
Permit Number:	P0132459
Permit Type:	Renewal
Issued:	09/21/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Freeman Enclosure System

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Authorization

Facility ID: 1413020501
Application Number(s): A0072197A0072197
Permit Number: P0132459
Permit Description: Freeman Enclosure System designs and manufactures enclosure systems, fuel tanks, and accessory equipment for on-site power generation. The facility has three emission units, K001, K002 and K004, with particulate filters which are used to coat miscellaneous metal parts. No changes have been requested. The facility revised calculations to better represent the actual emissions for the facility when
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 09/21/2026
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:

Freeman Enclosure System
4160 Half Acre Road
Batavia, OH 45103

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: P0132459

Permit Description: Freeman Enclosure System designs and manufactures enclosure systems, fuel tanks, and accessory equipment for on-site power generation. The facility has three emission units, K001, K002 and K004, with particulate filters which are used to coat miscellaneous metal parts. No changes have been requested. The facility revised calculations to better represent the actual emissions for the facility when

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

Emissions Unit ID:	K004
Company Equipment ID:	Big spray booth
Superseded Permit Number:	P0122933
General Permit Category and Type:	Not Applicable

Group Name: Paint Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	Big spray booth
Superseded Permit Number:	P0122933
General Permit Category and Type:	Not Applicable P0122933
Emissions Unit ID:	K002
Company Equipment ID:	Small spray booth 1
Superseded Permit Number:	P0122933
General Permit Category and Type:	Not Applicable P0122933

List of Commonly Used Abbreviations

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



A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the 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.



**Environmental
Protection
Agency**

Draft Permit-to-Install and Operate

Freeman Enclosure System

Permit Number: P0132459

Facility ID: 1413020501

Effective Date: To be entered upon final issuance

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) None.
2. The Ohio EPA has determined that this facility may be subject to the requirements of a federal rule that the Ohio EPA does not have the delegated authority to implement. Specifically:
 - a) On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule; and/or
 - b) On July 23, 2008, U.S.EPA promulgated the NESHAP for Nine Metal Fabrication and Finishing Source Categories at Area Sources, 40 CFR Part 63, Subpart XXXXXX. Metal fabrication of finishing metals containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) must be operated in compliance with this federal rule.

Although Ohio EPA has determined that one or both of these rules (also known as a GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Environmental
Protection
Agency**

Draft Permit-to-Install and Operate

Freeman Enclosure System

Permit Number: P0132459

Facility ID: 1413020501

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K004, Big spray booth

Operations, Property and/or Equipment Description:

Cross draft paint booth with particulate filter

- 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)c., b)(2)a., d)(7), d)(8) and e)(4)

- (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. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)	The emissions limitation specified by this rule for VOC emissions is equivalent to the emissions limitation established pursuant to OAC rule 3745-21-09(U)(1).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under 3745-31-05(A)(3) do not apply to particulate emissions since the calculated annual emission rate is less than 10 tons/year taking into account the federally enforceable work practice requirements in OAC rule 3745-17-11(C).
c.	OAC rule 3745-17-11(C)	See b)(2)a. and c)(1)-(2) below.
d.	OAC rule 3745-21-09(U)(1)	See b)(2)b. below.

- (2) Additional Terms and Conditions

- a. EU K004 is exempt from the particulate control requirements in OAC rule 3745-17-11(C) and c)(1)-(2) and d)(2)-(6) of this permit if the miscellaneous metal coating line meets any one of the following criteria:

- i. surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings; or
- ii. surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods.



- b. The VOC content of the coatings employed shall not exceed the following limitations, as applied:
- i. 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a clear coating;
 - ii. 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a zinc rich primer coating;
 - iii. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating;
 - iv. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding two hundred degrees Fahrenheit;
 - v. 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum;
 - vi. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum;
 - vii. 4.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a glass adhesion body primer coating used for the installation of any glass windows during the assembly of automobiles and trucks;
 - viii. 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a high performance architectural aluminum coating; or
 - ix. 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any coating that is not regulated under any of the eight categories listed above.

If a miscellaneous metal parts and products coating is subject to two or more of the VOC content limitations listed above the limit which is least restrictive shall apply.

c) **Operational Restrictions**

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever EU K004 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 must collect and record the following information for the miscellaneous metal parts coating line to demonstrate compliance with the coating VOC content limitations, either by means of use of complying coatings (i.e., each coating used complies with the applicable



emissions limitation, as applied), or by means of a daily volume-weighted average VOC content:

a. Compliant Coating Option. If selecting this option, the permittee must collect and record the following information each month:

- i. the name, identification number and type (for example, clear coat subject to OAC rule 3745-21-09(U)(1)(a)) of each coating applied and each cleaning material employed; and
- ii. the mass of VOC per volume of each coating, in pounds per gallon, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

Where:

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

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

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

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

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating;

W_W = weight fraction of water in coating, in pound of water per pound of coating;

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating;

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating;

V_W = volume fraction of water in coating, in gallon of water per gallon of coating; and

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

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

b. Daily Weighted Average Option. If selecting this option, the permittee must collect and record the following information each day:

- i. the name, identification number and type (for example, clear coat subject to OAC rule 3745-21-09(U)(1)(a)) of each coating applied and each cleaning material employed;
- ii. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and



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

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

Where:

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

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

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

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

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

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

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

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating;

W_W = weight fraction of water in coating, in pound of water per pound of coating;

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating;

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating;

V_W = volume fraction of water in coating, in gallon of water per gallon of coating;

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating;

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t";

L_C = liquid volume of coating employed during time period "t", in gallons of coating;

M_C = mass of coating employed during the time period "t", in pounds of coating;

i = subscript denoting a specific coating employed during time period "t";

n = total number of coatings employed during time period "t"; and



t = time period specified for the weighted average VOC content is per day and not included in the calculation.

- (2) 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.
- (3) 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.
- (4) 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.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of the 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.

- (6) 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.
- (7) If the maximum annual emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, exceed one ton per year, the following requirements apply:
 - a. The permittee has confirmed that potential emissions of each toxic air contaminant from this emissions unit are less than the applicable maximum hourly emission rate listed in Appendix A of the Qualifying Criteria document for GP 3.12. The maximum hourly emission rate for each compound was established at less than eighty per cent of its maximum acceptable ground level concentration (MAGLC) as determined through toxic air contaminant modeling.



- b. New coating or cleanup materials shall not be employed in this emissions unit without evaluating each toxic air contaminant in accordance with Appendix A of the Qualifying Criteria document for GP 3.12.
- c. Other important changes that can affect the parameters/values used in determining compliance with the maximum hourly emission rate include, but are not limited to, the following:
 - i. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - iii. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes by demonstrating that potential emissions of each toxic air contaminant do not exceed its maximum hourly emission rate in Appendix A of the Qualifying Criteria document for GP 3.12, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented.

- d. Prior to making a "modification" as defined by OAC rule 3745-31-01, the permittee must evaluate any changes in the composition of the materials used or use of new materials that would cause the emissions of any toxic air contaminant to increase. The permittee must apply for an individual permit-to-install and operate if new or increased emissions of any toxic air contaminant no longer comply with the applicable maximum hourly emissions rate in Appendix A of the Qualifying Criteria document for GP 3.12.
- e. The Director may consider any significant departure from the operations of the emissions unit that the permittee committed to in the Qualifying Criteria document to be a modification that results in greater emissions than the emissions rate modeled, and he/she may require the permittee to submit a permit application for the increased emissions.
- f. The permittee shall maintain a record of any change made to a parameter or value used to evaluate emissions of toxic air contaminants to complete the Qualifying Criteria document for GP 3.12 to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F). The record shall include the date and reason(s) for the change and if the change would increase the maximum emissions rate of any toxic air contaminant or result in the emissions of a new toxic air contaminant.



- (8) If the maximum annual emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, do not exceed one ton per year, modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), is not necessary. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate 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 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install and operate.

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 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.
- (3) The permittee shall notify the Ohio EPA DO/LAA agency in writing of any daily record showing use of noncomplying coatings or the daily volume-weighted average VOC content in excess of the applicable limitation. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA district office or local air agency within 30 days after the exceedance occurs for the compliant coating option or 45 days after the exceedance occurs for the daily volume-weighted average option.
- (4) If the maximum annual emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, exceed one ton per year, the permittee shall include any change made to a parameter or value used to evaluate emissions of toxic air contaminants to complete the Qualifying Criteria document for GP 3.12 to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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. Emissions Limitation



The VOC content of the coatings employed shall not exceed the limitations listed in b)(2)c., as applied.

Applicable Compliance Method:

Compliance with the coating content limitation shall be demonstrated based on the recordkeeping requirements in d)(1) of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of all coatings and cleaning materials.

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group - Paint Spray Booths: K001, K002,

EU ID	Operations, Property and/or Equipment Description
K001	Miscellaneous metal parts paint spray booth 1 (Large booth)
K002	Miscellaneous metal parts paint spray booth 2 (Medium booth)

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. d)(9) - d)(13)

(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., c)(1), d)(1)e., d)(2)e., d)(3), e)(7), f)(1)b. and f)(1)e.

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)	Volatile organic compound (VOC) emissions from emissions units K001 and K002 shall not exceed 10.5 pounds per hour from each emission unit from coating application. The hourly emission limitation is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation. The requirements of this rule also include compliance with OAC rules 3745-31-05(D), 3745-17-11(C) and 3745-21-09(U)(1)(c). See b)(2)a.
b.	OAC rule 3745-31-05(D)	VOC emissions from emissions units K001 and K002 shall not exceed 20.72 tons per year (TPY) from each emission unit based on a rolling, 12-month summation, from each coating application and cleaning



		material usage (parts cleaning prior to coating and post-coating cleanup). See c)(1).
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
d.	OAC rule 3745-21-09(U)(1)(c)	Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
e.	OAC rule 3745-21-26	Applicable Maximum VOC Content Limitations for Metal Parts and Products Coatings in OAC rule 3745-21-26(C)(1) Table 1; Coating Application Method Standards in OAC rule 3745-21-26(D); and Work Practice Standards in OAC rule 3745-21-26(E). See b)(2)a.-b., c)(4)-(6)

(2) Additional Terms and Conditions

- a. On March 27, 2022, Ohio EPA amended the RACT rules in OAC Chapter 3745-21 for existing sources located in Hamilton County, which includes K001 and K002. Pursuant to OAC rule 3745-21-26(A)(1), unless otherwise exempt, surface coating of miscellaneous metal and plastic parts coating lines in Hamilton County, with total actual VOC emissions from all miscellaneous metal or plastic parts coating operations including related cleaning operations equal to or greater than 2.7 tons per rolling twelve-month period before the application of control systems and devices, shall comply with the applicable VOC content and/or VOC emissions control limitations in paragraphs (B) to (I) of OAC rule 3745-21-26 no later than March 1, 2023.
- b. Pursuant to OAC rule 3745-21-26(I)(6), the permittee shall notify the Ohio EPA district office or local air agency in writing within thirty days following the first documented achievement of compliance with each of the requirements in OAC rule 3745-21-26(C)(1). The notification shall provide the information specified in OAC rule 3745-21-26(I)(6)(b).
- c. Based on the information contained in Application A0072197 submitted July 19, 2022 and the required OAC rule 3745-21-26(I) notification and compliance certification submitted on July 17, 2023, the permittee has elected to comply with the requirements in "Option one" from OAC rule 3745-21-26(C) as outlined in c)(4) below.

c) Operational Restrictions

- (1) The maximum annual coating usage for each emissions unit shall not exceed 6240 gallons per year, excluding water and exempt solvents, as applied, based on a rolling, 12-month summation and the maximum annual cleaning material usage (as evaporated) for each emissions unit shall not exceed 2800 gallons per year, based on a rolling, 12-month summation.



- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever each of these emissions units are in operation and shall maintain the dry particulate filters in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) 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.
- (4) OAC rule 3745-21-26(C) Option one. VOC content limitations based on low-VOC coatings as follows in Table 1 and the use of application methods specified in paragraph c)(2).

Table 1. - ***Metal parts and products*** maximum VOC content limitations [mass of VOC per volume of coating (excluding water and exempt compounds, as applied)]*.

<i>Coating Category</i>	<i>Air Dried, Pound VOC per Gallon Coating</i>	<i>Baked, Pound VOC per Gallon Coating</i>
General One-Component	2.8	2.3
General Multi-Component	2.8	2.3
Camouflage	3.5	3.5
Electric-Insulating Varnish	3.5	3.5
Etching Filler	3.5	3.5
Extreme High-Gloss	3.5	3.0
Extreme Performance	3.5	3.0
Heat-Resistant	3.5	3.0
High-Performance Architectural	6.2	6.2
High-Temperature	3.5	3.5
Metallic	3.5	3.5
Military Specification	2.8	2.3
Mold-Seal	3.5	3.5
Pan Backing	3.5	3.5
Prefabricated Architectural Multi-Component	3.5	2.3
Prefabricated Architectural One-Component	3.5	2.3
Pretreatment	3.5	3.5
Repair and Touch-Up	3.5	3.0
Silicone Release	3.5	3.5
Solar-Absorbent	3.5	3.0
Vacuum Metallizing	3.5	3.5
Drum, New, Exterior	2.8	2.8
Drum, New, Interior	3.5	3.5
Drum, Reconditioned, Exterior	3.5	3.5
Drum, Reconditioned, Interior	4.2	4.2

*If more than one emission limitation in the Table(s) applies to a specific coating, then the least stringent emission limitation may be applied. If a coating does not meet a specific coating category definition, then it can be assumed to be a general use coating and the VOC limit for "general" coating or "other" coating shall apply.



- (5) One, or a combination, of the following application methods shall be used for coating application:
 - a. Electrostatic equipment;
 - b. High volume low pressure (HVLP) spray equipment;
 - c. Flow coating;
 - d. Roller coating;
 - e. Dip coating, including electrodeposition;
 - f. Airless spray;
 - g. Air-assisted airless spray; and/or
 - h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
 - (6) 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; and
 - 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 collect and record the following information each month for each emissions unit:
 - a. the company identification of each coating, as applied.
 - b. the VOC content (in pounds of VOC/gallon of coating) of each coating (excluding water and exempt solvents), as applied;
 - c. the number of gallons of each coating employed (excluding water and exempt solvents);



d. the total VOC emissions, in pounds or ton [summation of (b x c) for all coating materials].

e. The rolling 12-month summation of coating usage.

The records contained in d)(1)a. – d. shall be kept in accordance with the Standard Terms and Conditions of this permit.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information for each month for each emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all cleanup materials employed, in pounds, i.e., the sum of d)(2)b. times d)(2)c. for each cleanup employed; and

e. the rolling, 12-month summation of the cleanup material usage.

(3) The coating and cleanup material emissions in d)(1)d. and d)(2)d. shall be summarized monthly and annually to demonstrate compliance with the annual coating and cleanup material emission limitations.

(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.
- (9) The permit to install for emissions units K001 and K002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust systems, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each pollutant emitted by the EUs using data from the permit to install application and the SCREEN 3.0 model (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 maximum acceptable ground-level concentration (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 EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 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 emissions units, 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 *worst-case* pollutant:

- i. Toxic Contaminant: toluene
TLV (mg/m³): 1,884
Maximum Hourly Emission Rate (lbs/hr): 21.0 lbs/hr, K001 and K002, combined
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³):
2025 for emissions units K001 and K002, combined
MAGLC (ug/m³): 4485

The permittee has demonstrated that emissions of toluene, from EUs K001 and K002, are calculated to be less than 80 percent 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).

- (10) Prior to making any physical changes to or changes in the method of operation of the EU/EUs that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
- c. Physical changes to the EU/EUs or exhaust parameters (for example, increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (11) 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/EUs** 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.
- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):



- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units 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 emissions units or the materials applied.
- (13) 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 Permit Evaluation Report (PER) to the Ohio EPA DO/LAA 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.
 - (3) The permittee shall notify the Director (the appropriate Ohio EPA DO/LAA) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
 - (4) The owner of operator of a coating line that is subject to OAC rule 3745-21-26, is located in Butler, Clermont, Hamilton or Warren county, and has an initial startup of the coating line



before the effective date of this rule shall notify the appropriate Ohio EPA district office or local air agency (SWOAQA) in writing that the coating line is subject to this rule not later than sixty days after the effective date of this rule, providing the information specified:

- a. Name and address of the owner or operator;
- b. Address (i.e., physical location) of the facility;
- c. Equipment description and Ohio EPA application number (if assigned) of the subject coating line;
- d. Identification of the VOC emission requirement, the means of compliance, and the compliance date for the subject coating line; and
- e. An application for an operating permit or an application for a modification to an operating permit in accordance with Chapter 3745-77 of the Administrative Code (for sources subject to the Title V permit program) or an application for a permit-to-install and operate or an application for a modification to a permit-to-install and operate in accordance with Chapter 3745-31 of the Administrative Code (for sources not subject to the Title V permit program) for each subject process that meets one of the following:
 - i. The process does not possess an effective operating permit or permit-to-install and operate; and
 - ii. The process possesses an effective operating permit or permit-to-install and operate and the owner or operator cannot certify in writing to the director that such subject process is in compliance with this rule. An application for an operating permit or permit-to-install and operate is not required provided the subject process is operating under an effective permit and certifies compliance. Such certification shall include all compliance certification requirements under paragraph (I)(6) of this rule.

(5) OAC rule 3745-21-26 Compliance Certification Requirements

The owner or operator of a coating line that is subject to this OAC rule 3745-21-26 shall notify the Ohio EPA district office or local air agency (SWOAQA) in writing within thirty days following, for a coating line subject to the VOC emission requirements in c)(1) above, the first documented achievement of compliance with each of the requirements.

The compliance certification under paragraph shall provide the following, where applicable:

- a. A description of the requirements;
- b. A description of the VOC emission control system;
- c. A description of the monitoring devices;
- d. A description of the records that document continuing compliance;
- e. The results of any compliance tests, including documentation of test data;
- f. The results of any records that document continuing compliance, including calculations; and



- g. A statement by the owner or operator as to whether the subject coating line has complied with the requirements.
- (6) 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.
- (7) 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 potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month VOC emission limitation;
 - ii. all exceedances of the rolling, 12-month coating and cleanup material usage limitations;
 - 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, 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).

- (8) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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. Emissions Limitation
VOC emissions from EUs K001 and K002 shall not exceed 10.5 pounds per hour each from coating application.



Applicable Compliance Method:

VOC emissions from coating application were calculated using the following equation:

$$\text{lbs/hr VOC} = (A) \times (B)$$

where,

A = maximum VOC content of coatings, 3.5 lbs/gallon

B = maximum hourly usage of coatings, 3.0 gallons

b. Emissions Limitation:

VOC emissions shall not exceed 20.72 tons per year (TPY), from *each* EU (K001 or K002) based on a rolling, 12-month summation, from coating application and cleaning material usage (parts cleaning prior to coating and post-coating cleanup).

Applicable Compliance Method:

VOC emissions from coating application and cleaning material usage were calculated using the following equation:

$$\text{tons/yr VOC} = [(A) \times (B) \times 1 \text{ ton}/2000 \text{ lbs}] + [(C) \times (D) \times 1 \text{ ton}/2000 \text{ lbs}]$$

where,

A = maximum VOC content of coatings, 3.5 lbs/gallon

B = maximum coating usage per rolling, 12-month summation, 6240 gallons

C = maximum VOC content of cleanup material, 7.0 lbs/gallon

D = maximum cleanup material usage per rolling, 12-month summation, 2800 gallons

c. Emissions Limitation:

Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emissions Limitation:

The VOC content, as applied, of each cleaning material employed shall not exceed the value in Table 1 in C)2.c)(4).

Applicable Compliance Method:

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.



e. Emissions Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 6240 gallons per year, excluding water and exempt solvents, as applied, based on a rolling, 12-month summation and the maximum annual cleaning material usage (as evaporated) for this emissions unit shall not exceed 2800 gallons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping required in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.