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Facility Name: **Reed Air Products Group**

Application Number: **03-1276**

Date: **July 14, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

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APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
-------------------------------------------	---------------------------------------------	------------------------------	-----------------------------------------------	--------------------------------------------------------------------------------------

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Reed Air Products Group** located in **Wood** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
K001 (Mod)	
K001 (Mod)	Metal architectural louver coating line (Mod. to increase usage)
	K001 (Mod) Cont'd

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
-------------------------------------------	---------------------------------------------	------------------------------	-----------------------------------------------	--------------------------------------------------------------------------------------

BAT
Determination

Compliance
with terms and
conditions in
this permit
and Ohio EPA
Air Toxics
Policy

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u> (A) (1) - (3)	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
			<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	3745-31-05			16.2 pounds VOC/hour from application of coating materials
		3745-21-09 (U) (1) (h)		699 pounds VOC/month from application of cleanup materials
		3745-21-09 (U) (1) (d)		50.0 tons VOC/year for all coatings and cleanup materials (See Additional Special Terms and Conditions)
		3745-17-11 (B) (1)		10.0 tons for any single hazardous air pollutant (HAP)/year (See Additional Special Terms and Conditions)
	3745-17-07			25.0 tons

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aggrega te for all HAPS/ye ar (See Additio nal Special Terms and Conditi ons) 0.10 pound particu late emissio ns (PE)/ho ur, 0.44 ton PE/year	water and exempt solvents, for all high performance architectural aluminum coatings. 3.5 pounds VOC/gallon excluding water and exempt solvents for all other coatings. (*) (*)			
0 percent Opacity as a six minute average				
6.2 pounds VOC/gal lon, excludi ng				

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
-------------------------------------------	---------------------------------------------	------------------------------	-----------------------------------------------	--------------------------------------------------------------------------------------

* The emissions limitations based on this applicable rule are less stringent than the limitations established pursuant to OAC Rule 3745-31-05.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	0.44
VOC	50.0

* VOC emissions represent an increase of 29.01 TPY over the previous limit established in PTI 03-1658. Particulate emissions were not addressed in previous permits.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

General Information

Reed Air Products is proposing a modification to emissions unit K001 in order to increase the VOC content restriction to 6.2 lbs/gallon excluding water as specified in OAC 3745-21-09 (U)(1)(h), increase the allowable emission, and avoid the requirements of Title V and MACT 112(g) through federally enforceable terms and conditions.

A. Applicable Emission Limitations and/or Control Requirements

1. The emissions of VOC from emissions unit K001 shall not exceed 50.0 tons per year based upon a rolling 12 month summation of the monthly VOC input rates* to emissions unit K001.

* Monthly VOC input rate = $\sum (C \times D)$ where C = the number of gallons of each coating/cleanup materials employed per month and D = the VOC content of each coating/cleanup material employed in pounds of VOC per gallon of coating/cleanup materials. Monthly VOC input rates are equivalent to monthly VOC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating/cleanup materials being emitted.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the input rates specified in the following table:

<u>Month(s)</u>	Maximum Allowable Cumulative Input Rates of VOC's (Coatings <u>and</u> Cleanup)
1	6.36
1-2	12.72
1-3	19.08
1-4	25.44
1-5	31.8
1-6	38.16
1-7	44.52
1-8	50.0
1-9	50.0
1-10	50.0
1-11	50.0
1-12	50.0

2. The emission of **any single HAP** from emissions unit K001 shall not exceed 10.0 tons per rolling 12 month period based upon the monthly

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HAP input rates* to emissions unit K001.

- * Monthly HAP input rate = $\sum C \times D$ where C = the number of gallons of each coating/cleanup materials employed per month and D = the HAP content of each coating/cleanup material employed in pounds of HAP per gallon of coating/cleanup materials. Monthly HAP input rates are equivalent to monthly HAP emission rates and, in the absence of add-on controls, are based upon 100 percent of the solvent in the coating/cleanup materials being emitted.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the input rates specified in the following table:

Maximum Allowable Cumulative Input Rates
of HAP's (Coatings and Cleanup)

<u>Month(s)</u>	
1	6.36
1-2	10.0
1-3	10.0
1-4	10.0
1-5	10.0
1-6	10.0
1-7	10.0
1-8	10.0
1-9	10.0
1-10	10.0
1-11	10.0
1-12	10.0

3. The emissions of **any aggregate of HAPS** from emissions unit K001 shall not exceed 25.0 tons of per rolling 12 month period based upon the monthly HAP input rates* to emissions unit K001.

- * Monthly HAP input rate = $\sum C \times D$ where C = the number of gallons of each coating/cleanup materials employed per month and D = the HAP content of each coating/cleanup material employed in pounds of HAP per gallon of coating/cleanup materials. Monthly HAP input rates are equivalent to monthly HAP emission rates and, in the absence of add-on controls, are based upon 100 percent of

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the solvent in the coating/cleanup materials being emitted.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the input rates specified in the following table:

<u>Month(s)</u>	Maximum Allowable Cumulative Input Rates of HAP's (Coatings <u>and Cleanup</u>)
1	6.36
1-2	12.72
1-3	19.08
1-4	25.0
1-5	25.0
1-6	25.0
1-7	25.0
1-8	25.0
1-9	25.0
1-10	25.0
1-11	25.0
1-12	25.0

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC/HAP emission limitations for emissions units K001 shall be based upon a rolling, 12-month summation of the coating and cleanup material VOC/HAP input rates.

B. Operational Restrictions

1. This permit allows the use of the coating materials specified by the permittee in the PTI 03-1276 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on coating material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The

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following summarizes the results of the modeling for each pollutant:

Pollutant: Xylene

TLV (ug/m3): 434,000 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 16.2 (*)

**Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):
674.4**

MAGLC (ug/m3): 10,333 ug/m³

*Note: These levels represent total emissions and not the incremental increases resulting from the modifications. Although the air toxics policy only requires the incremental increases be modeled, a demonstration of compliance with the air toxics policy at these levels is acceptable.

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the Ohio EPA, Northwest District Office:

- a. any changes in the composition of the coating materials, or the use of new coating materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
- c. any change in the composition of the coatings or cleanup materials, or use of new coating materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V); and,
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

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For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

2. The permittee shall use only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(e) and OAC Rule 3745-21-09 (U)(1)(h) in emissions unit K001 on an "as applied" basis.
3. All coatings employed in this emissions unit which are not classified as "high performance architectural aluminum coatings" [defined in OAC Rule 3745-21-01] shall not be dried at temperatures exceeding 250 degrees Fahrenheit.
4. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K001:
 - a. the name and identification number of each coating, as applied; and,
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

FOR INPUT RATES FROM COATING MATERIAL USAGE IN THIS EMISSIONS UNIT

- a. the name and identification for each coating material employed;
- b. the number of gallons of each coating material employed;
- c. the VOC content of each coating material in lbs VOC/gallon as applied;
- d. the VOC input rate for each coating material in tons/month $[(b) \times (c)/2000]$; and,
- e. the total VOC input rate for all coating materials, in tons/month [summation of (d)].

FOR INPUT RATES FROM CLEANUP MATERIAL USAGE IN THIS EMISSIONS UNIT:

- f. the Company identification of each cleanup material employed;
- g. the number of gallons of each cleanup material employed;
- h. the VOC content of each cleanup material, in pounds/gallon;
- i. the VOC input rate for each cleanup material, in tons/month $[(g) \times$

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(h) / 2000]; and,

- j. the total VOC input rate for all cleanup material, in tons/month [summation of (l).

FOR THE COMBINED INPUT RATES FROM ALL COATING AND CLEANUP IN THIS EMISSIONS UNIT:

- k. the total VOC input rate for all coatings and cleanup materials, in tons/month [(e) + (j)]; and,
 - l. beginning after the first 12 calendar months of operation following the issuance of this permit, the total VOC input rate/rolling 12-month period [calculated as follows: input/rolling 12-month period = (k) from preceding 11 months + (k) for the current month]. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC input rate for each calendar month.
3. The permittee shall collect and record the following information for the purpose of determining annual HAP emissions:

FOR INPUT RATES FOR HAPS FROM ALL COATING AND CLEANUP MATERIALS IN THIS EMISSIONS UNIT:

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

- a. the name and identification number of each coating, as applied;
- b. the individual Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

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- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and,
- j. the total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Division of Air Pollution Control, Northwest District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean up materials. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.
- 5. The permittee shall record the temperature of the cure oven associated with this coating line when employing coatings in this emissions unit which are not classified as "high performance architectural aluminum coatings" [defined in OAC Rule 3745-21-01].
- 6. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for

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continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K001. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
3. The permittee shall notify the Director of any monthly record showing any deviation from the following:
 - a. the total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period;
 - b. the total combined HAP emissions limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period; and,
 - c. exceedances of the rolling 12 month, input rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC input rate.
4. The permittee shall submit quarterly written reports for emissions unit K001 of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These

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quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements/Compliance Methods Determinations

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements and Air Emissions Summary of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations

K001: 16.2 lbs VOC/hour from all coating materials
699 lbs VOC/month from all cleanup materials

Applicable Compliance Method

The hourly VOC limit for coatings and the monthly VOC limit for cleanup operations are based on the emission unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

- b. Emission Limitations

K001: 50.0 TPY based on a rolling, 12-month summation of VOC input rates from all coating and cleanup materials

10.0 TPY based on a rolling, 12-month summation of any single HAP input rate from all coatings and cleanup materials

25.0 TPY based on a rolling, 12-month summation of an aggregate of all HAP input rates from all coatings and cleanup materials

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Applicable Compliance Method

The recordkeeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations

K001: 6.2 lbs VOC/gallon excluding water and exempt solvents for the application of high performance architectural aluminum coatings.

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials.

Applicable Compliance Method

The recordkeeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation

0.10 lb/hr particulate emissions, 0.44 ton/yr

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Applicable Compliance Method

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

E = particulate matter emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60 percent considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90 percent)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation

0 percent opacity as a six minute average except as provided by rule.

Applicable Compliance Method

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

F. Miscellaneous Requirements

1. None.