

## Synthetic Minor Determination and/or Netting Determination

Permit To Install: 08-04867

### A. Source Description

#### K001 and K002

Each unit consists of a roll coater with a drying oven. Each unit coats metal sheet material which is dried in its associated indirect natural gas fired curing oven. The uncontrolled emissions from the coaters are vented to atmosphere and emissions from the ovens are fugitive. Combustion emissions from the ovens are exempt from permitting and their emissions are insignificant.

#### R001

This is a parts wiping operation where solvents are used to cleanup metal and plastics parts before they are boxed and shipped. All emissions are fugitive.

#### R002 - R006, R008 and R009

Each of these silk screen printing press has a drying oven. Units R002, R003, R008 and R009 use an indirect natural gas fired oven. R004 uses a "combi-oven" that is heated by electric and natural gas. R005 and R006 use an electric oven. These units use both inks that requires heat curing, and inks that do not. . Each emissions unit silk screen prints metal or plastic sheet material which are dried in its associated oven. The uncontrolled emissions from the printing coaters are vented to atmosphere and emissions from the ovens are fugitive. Combustion emissions from the ovens are exempt from permitting and their emissions are insignificant.

#### R007

R007 uses an UV curing oven and silk screen prints metal or plastic sheet material which are dried in its associated curing oven. This unit does *not* use ink that requires heat curing. The uncontrolled emissions from the printing coater is vented to the atmosphere and emissions from the ovens are fugitive. There are no fuel combustion emissions from this oven

### B. Facility Emissions and Attainment Status

This new location for Brainerd Industries is located Montgomery County which is currently non-attainment for PM2.5. The facility will not be a major source of OC emissions as defined by Title V. The facility HAP PTE is greater than the 25 tpy for combined HAP compounds. Brainerd Industries has requested federally enforceable restrictions to ensure the HAPs emissions from the facility are maintained below the thresholds to prevent triggering major source permitting requirements. This PTI will be a synthetic minor for HAPS to restrict the HAPs emissions to below 9.9 tpy for single HAP compound, and 24.9 for combined HAP compounds, to avoid Title V permitting.

### C. Source Emissions

#### K001 and K002

The hourly, daily and annual PTE values (including cleanup) were determined to be 5.48 lb-OC/hour, 131.50 lb-OC/day, and 24.0 TPY OC for each unit. Since the PTE for these units is greater than 10 tpy, BAT applies to each unit. The permittee voluntarily requested enforceable emissions restrictions to limit the daily and annual emissions to establish the PTE for this pollutant. The OC emissions are limited to 87.68 lbs/day, and 16.0 tons/year, including cleanup. These units are a source of HAP compounds that contribute to the facility's PTE for HAPS.

#### R001

The hourly, daily and annual PTE values (including cleanup) were determined to be 0.374 lb-OC/hour, 8.88 lb-OC/day, and 1.62 TPY OC. Since the PTE for this units is less than 10 tpy, BAT does not apply. This unit is a source of HAP compounds that contribute to the facility's PTE for HAPS.

#### R002-R006, R008 and R009

The hourly, daily and annual PTE values (including cleanup) were determined to be 1.134 lb-OC/hour, 27.22 lb-OC/day, and 4.97 TPY OC for each unit. Since the PTE for these units is less than 10 tpy, BAT does not apply to each. The OC emissions are limited to rule based 3 lb/hr and 15 lbs/day, including cleanup, resulting in 2.74 tpy for each unit. These units are a source of HAP compounds that contribute to the facility's PTE for HAPS.

#### R007

The hourly, daily and annual PTE values (including cleanup) were determined to be 1.134 lb-OC/hour, 27.22 lb-OC/day, and 4.97 TPY OC for each unit. Since the PTE for these units is less than 10 tpy, BAT does not apply to each. The OC emissions are limited to rule based 8 lb/hr and 140lbs/day, including cleanup,

resulting in 7.30 tpy for each unit. These units are a source of HAP compounds that contribute to the facility's PTE for HAPS.

D. Conclusion

This PTI will include federally enforceable restrictions voluntarily requested by Brainerd which will establish a facility PTE of 60.09 tpy OC and be issued as a synthetic minor containing federally enforceable requirements to ensure the HAP emissions for the facility are maintained below the Title V and MACT thresholds. These restrictions will insure the individual HAP emissions will be below 9.9 TPY and the combined HAP emissions will be less than 24.9 TPY. Monitoring, record keeping and quarterly deviation reporting will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, Brainerd will not trigger major Title V permitting requirements for HAP emissions.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**Application No:** 08-04867

**Fac ID:** 0857093330

**DATE:** 10/30/2007

Brainerd Industries Incorporated  
Doug Russell  
680 Precision Court  
Miamisburg, OH 45342-6138

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

RAPCA

MIAMI VALLEY REG PLANNING COMM

KY

IN

**MONTGOMERY COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04867** FOR AN AIR CONTAMINANT SOURCE  
FOR **Brainerd Industries Incorporated**

On 10/30/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Brainerd Industries Incorporated**, located at **680 Precision Court, Miamisburg, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04867:

**Parts cleaning, 2 roll coaters and ovens, 8 silk screen presses and ovens, powder coat line, and silk screen wash out station.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280  
[(937)225-4435]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 08-04867**

Application Number: 08-04867  
Facility ID: 0857093330  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Brainerd Industries Incorporated  
Person to Contact: Doug Russell  
Address: 680 Precision Court  
                Miamisburg, OH 45342-6138

Location of proposed air contaminant source(s) [emissions unit(s)]:

**680 Precision Court  
Miamisburg, Ohio**

Description of proposed emissions unit(s):

**Parts cleaning, 2 roll coaters and ovens, 8 silk screen presses and ovens, powder coat line, and silk screen wash out station.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports 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 appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

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

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

**Brainerd Industries Incorporated**

**Facility ID: 0857093330**

**PTI Application: 08-04867**

**Issued: To be entered upon final issuance**

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

**Brainerd Industries Incorporated**

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 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 the requirements of this permit or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**Brainerd Industries Incorporated**

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**13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	60.09
Single HAP	9.9
Combined HAPs	24.9

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K001) - roll coater and oven (metal parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions shall not exceed 5.48 lbs/hour, including cleanup. See A.2.a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(i).</p>
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage rate shall be less than or equal to 8 gallons per day.
OAC 3745-31-05(C) (synthetic minor to avoid Title V and voluntary limits)	<p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p> <p>The organic compound (OC) emissions shall not exceed 87.68 lbs/day and 16.0 tons/year, including cleanup. See A.2.b.</p>
OAC rule 3745-114-01 and ORC 3704.03(F)	See section C.4.

**2. Additional Terms and Conditions**

- 2.a The 5.48 pound of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The permittee has requested federally enforceable emissions restrictions to limit the daily and annual OC emissions to establish the PTE for this pollutant.

**B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP<sup>7</sup> emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.

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- f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of  $(b \times d) + (f \times h)$ ], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of  $(c \times d) + (g \times h)$ ], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

- 4. 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 system, 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 this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The

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following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m<sup>3</sup>): 204.83

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 214.2

MAGLC (ug/m<sup>3</sup>): 4,876.8

Pollutant: xylene

TLV (mg/m<sup>3</sup>): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.386

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 107.1

MAGLC (ug/m<sup>3</sup>): 10,337.9

Pollutant: isophorone

TLV (mg/m<sup>3</sup>): 28.26

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 214.2

MAGLC (ug/m<sup>3</sup>): 673.0

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

**D. Reporting Requirements**

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that included the following information when the emissions unit was in operation:
  - a. each day the OC emissions exceeded the daily emissions limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day; and
  - b. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual reports to the Director (the appropriate District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -

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The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -

Compliance shall be based upon the coating usage record keeping requirements specified in C.1. of this permit.

b. Emission Limitation-

The organic compound (OC) emissions from this emissions unit shall not exceed 5.48 lb/hr.

Applicable Compliance Method-

Compliance shall be determined by summation of the following:

- i. multiplying the maximum coating usage rate of 0.375 gal/hour multiplied by the coating OC content of 7.08 lb-OC/gal,
- ii. multiplying the maximum cleanup material 0.375 gal/hour multiplied by the cleanup OC content of 7.53 lb-OC/gal.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

c. Emission Limitation -

The OC emissions shall not exceed 87.68 lb/day OC, including cleanup

Applicable Compliance Method -

Compliance shall be determined by record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation -

The OC emissions shall not exceed 16.0 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the daily OC emission rates.

e. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources

Emissions Unit ID: **K001**

combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

#### **F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K002) - Black Brothers roll coater and oven (metal parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions shall not exceed 5.48 lbs/hour, including cleanup. See A.2.a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(i).</p>
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage rate shall be less than or equal to 8 gallons per day.
OAC 3745-31-05(C) (synthetic minor to avoid Title V and voluntary limits)	<p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p> <p>The organic compound (OC) emissions shall not exceed 87.68 lbs/day and 16.0 tons/year, including cleanup. See A.2.b.</p>
OAC rule 3745-114-01 and ORC 3704.03(F)	See section C.4.

**2. Additional Terms and Conditions**

- 2.a The 5.48 pound of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

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- 2.b** The permittee has requested federally enforceable emissions restrictions to limit the daily and annual OC emissions to establish the PTE for this pollutant.

**B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.

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- e. The name and company identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of  $(b \times d) + (f \times h)$ ], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of  $(c \times d) + (g \times h)$ ], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

- 4. 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 system, 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 this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0

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(or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m<sup>3</sup>): 204.83

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 214.2

MAGLC (ug/m<sup>3</sup>): 4,876.8

Pollutant: xylene

TLV (mg/m<sup>3</sup>): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.386

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 107.1

MAGLC (ug/m<sup>3</sup>): 10,337.9

Pollutant: isophorone

TLV (mg/m<sup>3</sup>): 28.26

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 214.2

MAGLC (ug/m<sup>3</sup>): 673.0

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

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increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that included the following information when the emissions unit was in operation:
  - a. each day the OC emissions exceeded the daily emissions limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day; and
  - b. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual reports to the Director (the appropriate District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

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- a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.  
  
Applicable Compliance Method -  
Compliance shall be based upon the coating usage record keeping requirements specified in C.1. of this permit.
  
- b. Emission Limitation-  
The organic compound (OC) emissions from this emissions unit shall not exceed 5.48 lb/hr.  
  
Applicable Compliance Method-  
Compliance shall be determined by summation of the following:
  - i. multiplying the maximum coating usage rate of 0.375 gal/hour multiplied by the coating OC content of 7.08 lb-OC/gal,
  - ii. multiplying the maximum cleanup material 0.375 gal/hour multiplied by the cleanup OC content of 7.53 lb-OC/gal.  
If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.
  
- c. Emission Limitation -  
The OC emissions shall not exceed 87.68 lb/day OC, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be determined by record keeping requirements specified in Section C.1. of this permit.
  
- d. Emission Limitation -  
The OC emissions shall not exceed 16.0 TPY OC, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the daily OC emission rates.
  
- e. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section

Emissions Unit ID: **K002**

112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

#### **F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R001) - parts wiping**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials.
OAC 3745-31-05(C) (synthetic minor to avoid Title V)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-114-01 and 3704.03(F)	See section C.4.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:

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- a. the company identification for each coating cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
  3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP<sup>\*</sup> emissions:
    - a. The name and company identification of each coating material employed.
    - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
    - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
    - d. The number of gallons of each coating material employed.
    - e. The name and company identification of each cleanup material employed.
    - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.

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- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of  $(b \times d) + (f \times h)$ ], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of  $(c \times d) + (g \times h)$ ], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

- 4. The permit to install for emissions units R001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, 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 this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
TLV (mg/m<sup>3</sup>): 176.24

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Maximum Hourly Emission Rate (lbs/hr): 0.243

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 504.5

MAGLC (ug/m3): 4,196.1

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and

**Emissions Unit ID: R001**

- c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

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**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

a. Emission Limitation -

The organic compound (OC) emissions shall not exceed 0.37 lbs/hour and 8.88 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation -

The organic compound (OC) emissions shall not exceed 1.62 tons/year coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

c. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit and shall be the summation of the monthly OC emission rates.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R002) - silk screen printing press and oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to OAC rule 3745-21-07(G)(1) and more stringent than the emission limitations

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established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

**B. Operational Restrictions**

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- 2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
- a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of  $(b \times d) + (f \times h)$ ], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of  $(c \times d) + (g \times h)$ ], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

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\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

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**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.  
  
Applicable Compliance Method -  
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.
  - b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Emissions Unit ID: **R002**

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## F. Miscellaneous Requirements

None

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R003) - Svecia silk screen printing press and oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	<p>The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p>
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual

Emissions Unit ID: R003

limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

## **B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings

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and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all

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coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.

Emissions Unit ID: **R003**

**Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

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- b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**E. Testing Requirements**

**Brainerd Industries Incorporated**  
DTI Application: 08 04867

**Facility ID: 0857093330**

Emissions Unit ID: **R003**

None

**F. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R004) - Svecia silk screen printing press and combi-oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual

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limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

**B. Operational Restrictions**

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- 2. The permittee shall calculate and record the total annual OC emissions from coatings

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and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all

**Brainerd Industries Incorporated**

DTL Application: 08 04867

**Facility ID: 0857093330**Emissions Unit ID: **R004**

coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

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**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.

**Brainerd Industries Incorporated**

**DTI Application: 08 04867**

**Facility ID: 0857093330**

**Emissions Unit ID: R004**

Applicable Compliance Method -  
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

**Issued: To be entered upon final issuance**

- b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**E. Testing Requirements**

Emissions Unit ID: **R004**

**Issued: To be entered upon final issuance**  
None

**F. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R005) - Svecia silk screen printing press and electric oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a The permittee shall at all times comply with the 2.74 tons/year OC annual

Emissions Unit ID: R005

limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

## **B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings

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and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all

Emissions Unit ID: **R005**

**Issued: To be entered upon final issuance**

coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.

Emissions Unit ID: **R005**

**Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

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- b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

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**Brainerd Industries Incorporated**  
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**Facility ID: 0857093330**

Emissions Unit ID: **R005**

None

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R006) - Svecia silk screen printing press and electric oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual

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limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

**B. Operational Restrictions**

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- 2. The permittee shall calculate and record the total annual OC emissions from coatings

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and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all

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coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

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**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.

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**Emissions Unit ID: R006**

Applicable Compliance Method -  
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

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- b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

**Issued: To be entered upon final issuance**  
None

Emissions Unit ID: **R006**

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R007) - Svecia silk screen printing press and UV oven (metal parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 7.3 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a The permittee shall at all times comply with the 7.3 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(2) and more stringent than the emission limitations established pursuant to OAC rule 3745-21-09(U)(2)(e)(i).
- 2.b By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(2) when coating either plastic or metal parts, including the 8

Emissions Unit ID: R007

gal/day coating use the limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year taking into account the federally enforceable rule limit of 40 lb/day OC under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by

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rule air contaminant sources combined for the purpose of determining the HAP\* emissions:

- a. The name and company identification of each coating material employed.
- b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
- c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
- d. The number of gallons of each coating material employed.
- e. The name and company identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of  $(b \times d) + (f \times h)$ ], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of  $(c \times d) + (g \times h)$ ], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

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Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be

Emissions Unit ID: R007

demonstrated in accordance with the following methods:

a. Emission Limitation -

The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -

Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

b. Emission Limitation -

The organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark,

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Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R008) - Cameo Saturn silk screen printing press and oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual

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limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

## **B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings

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and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP\* emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all

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coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

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**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.

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**Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

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- b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## F. Miscellaneous Requirements

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None

Emissions Unit ID: **R008**

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R009) - Renegade Saturn silk screen printing press and oven (metal and plastic parts)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V )	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.  The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a The permittee shall at all times comply with the 2.74 tons/year OC annual

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limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

**B. Operational Restrictions**

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- 2. The permittee shall calculate and record the total annual OC emissions from coatings

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and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP<sup>\*</sup> emissions:
  - a. The name and company identification of each coating material employed.
  - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
  - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
  - d. The number of gallons of each coating material employed.
  - e. The name and company identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
  - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of  $(b \times d) + (f \times h)$ ], in tons.
  - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of  $(c \times d) + (g \times h)$ ], in tons.
  - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
  - l. The rolling 12-month summation of the total combined HAP emissions from all

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coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

\*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

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**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
  - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission Limitation -  
The coating usage shall be less than or equal to 8 gallons per day.

**Brainerd Industries Incorporated**

**DTI Application: 08 04867**

**Facility ID: 0857093330**

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Applicable Compliance Method -  
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

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- b. Emission Limitation -  
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**E. Testing Requirements**

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None

**F. Miscellaneous Requirements**

None