

1

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

2

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

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

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

3

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

4

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

5

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

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

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

Ohio
EPA
Source
Number

R012
(Mod)

R012
(Mod)
Cont'd

R014
(Mod)
Cont'd

R014
(Mod)

R013
(Mod)

R013
(Mod)
Cont'd

Facility Name: **Budd Company, Plastics Division**
 Application Number: **03-3051**
 Date: **May 12, 1999**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R015 (Mod)	Source Identification <u>Description</u> Plastic automotive parts spray booth modification/ see Additional Special Terms and Conditions Introduction	Plastic automotive parts spray booth modification/ see Additional Special Terms and Conditions Introduction		
R015 (Mod) Cont'd			Plastic automotive parts spray booth modification/ see Additional Special Terms and Conditions Introduction	Plastic automotive parts spray booth modification/ see Additional Special Terms

Facility Name: **Budd Company, Plastics Division**
Application Number: **03-3051**
Date: **May 12, 1999**

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

Facility Name: **Budd Company, Plastics Division**
 Application Number: **03-3051**
 Date: **May 12, 1999**

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

Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials

Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials

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

Facility Name: **Budd Company, Plastics Division**
Application Number: **03-3051**
Date: **May 12, 1999**

Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photocemically reactive materials				

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Applicable Federal & <u>OAC Rules</u>			
3745-31-05	3745-21-07 (G)			
	3745-17-11 (B) (2)			
	3745-17-07 (A) (1-3)			
	3745-31-05		3745-21-07 (G)	
			3745-17-11 (B) (2)	
			3745-17-07 (A) (1-3)	
			3745-31-05	3745-21-07 (G)
				3745-17-11 (B) (2)
				3745-17-07 (A) (1-3)
				3745-31-05

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	3745-17-11 (B) (2)		(*)	(PE)/hour, 0.44 TPY
	3745-17-07 (A) (1-3)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	(*)	0 percent opacity as a 6 minute average
		15.0 pounds OC/hour, from application of coating materials	15.0 pounds OC/hour, from application of coating materials	(**)
		173.0 pounds OC/month from application of cleanup materials	173.0 pounds OC/month from application of cleanup materials	(*)
		66.7 TPY of OC from all coatings and cleanup materials	66.7 TPY of OC from all coatings and cleanup materials	15.0 pounds OC/hour, from application of coating materials
		Group limit of 124.0 tons/year for emissions units R012, R013, R014, and R015 (See Additional Special Term and Condition A.1.)	Group limit of 124.0 tons/year for emissions units R012, R013, R014, and R015 (See Additional Special Term and Condition A.1.)	173.0 pounds OC/month from application of cleanup materials
		0.10 pound Particulate emissions (PE)/hour, 0.44 TPY	0.10 pound Particulate emissions (PE)/hour, 0.44 TPY	66.7 TPY of OC from all coatings and cleanup materials
3745-21-07 (G)		0 percent opacity as a 6 minute average	0.10 pound Particulate emissions	Group limit of 124.0 tons/year for emissions units R012, R013, R014, and

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R015 (See Additio nal Special Term and Condi on A.1.)	pounds OC/hour, from application of coating materials 173.0 pounds OC/month from application of cleanup materials	(**) (*) (*)		
0.10 pound Particu late emissio ns (PE)/ho ur, 0.44 TPY	66.7 TPY of OC from all coatings and cleanup materials Group limit of 124.0 tons/year for emissions			
0 percent opacity as a 6 minute average	units R012, R013, R014, and R015 (See Additional Special Term and Condition A.1.)			
(*) (*) (*)	0.10 pound Particulate emissions (PE)/hour, 0.44 TPY			
15.0	0 percent opacity as a 6 minute average			

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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* The emissions limitations based on this applicable rule are less stringent than the limitations established pursuant to OAC Rule 3745-31-05.

** The requirements of OAC Rule 3745-21-07(G)(2) are not applicable as this emissions unit employs non-photochemically reactive materials per OAC Rule 3745-21-07(C)(5).

Facility Name: **Budd Company, Plastics Division**
 Application Number: **03-3051**
 Date: **May 12, 1999**

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year*</u>
PM	1.76
VOC	124.0

* This reflects an emissions increase of 39 tons of OC over previous permit limits. Previous PTI's failed to establish PE limits for spray coating operations.

REPORTING REQUIREMENTS

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

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office,**

15

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

347 North Dunbridge Road, Bowling Green, OH 43402.

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

General Information

This permit is a modification to existing spray booths R012-R015. This modification is being done to remove gallon usage restrictions and OC content restrictions which are no longer applicable to these emissions units as well as facilitate a 39 TPY increase in allowable emissions for all four emissions units. This permit is a synthetic minor to avoid the requirements of PSD, by synthetically limiting the potential-to-emit to 124.0 TPY.

A. Applicable Emissions Limitations and/or Control Requirements

1. The emissions of VOC from emissions unit R012, R013, R014, and R015 shall not exceed 124.0 tons per year based upon a rolling 12 month summation of the monthly VOC input rates* to emissions units R012, R013, R014, and R015.

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

16

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

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

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

<u>Month(s)</u>	<u>Maximum Allowable Cumulative OC Input Level (Coatings and Cleanup)</u>
1	21.6
1-2	43.2
1-3	64.8
1-4	86.4
1-5	108.0
1-6	124.0
1-7	124.0
1-8	124.0
1-9	124.0
1-10	124.0
1-11	124.0
1-12	124.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC emission limitations for emissions units R012, R013, R014 and R015 shall be based upon a rolling, 12-month summation of the coating and cleanup material OC input rates.

B. Operational Restrictions

1. This permit allows for the use of the coating and cleanup materials specified by the permittee in the application for PTI number 03-3051. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit was established in accordance with Ohio EPA's "Air Toxics Policy" and is based on the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for MIBK on the Screen3 model and a comparison of the predicted 1-hour maximum ground level concentration to the maximum allowable ground level concentration ("MAGLC"). The following summarizes the results of the modeling for MIBK:

Pollutant: MIBK

TLV (microgram/m³): 205,000

Maximum Hourly Emission Rate (lbs/hr): 15.00 ()**

Predicted 1-Hour Max. Concentration (microgram/m³): 670.7

MAGLC (microgram/m³): 4880.0

* These levels represent total emissions and not the

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

incremental increases resulting from the modifications. Although the air toxics policy only requires the incremental increases be modeled, a demonstration of compliance with the air toxics policy at these levels is acceptable. Additionally, the compound with the lowest TLV was modeled as being representative of 100 percent of the total emissions as an absolute worst case scenario.

** The maximum hourly emission rate is representative of a single emissions unit. As all emissions units in this permit are identical, the predicted 1-hour maximum concentration multiplied by 4 will be representative of the total concentration as a result of this permit. The resulting 2682.8 micrograms/m³ is lower than the MAGLC of 4880.0 micrograms/m³.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-3046 and the operating permit for each emissions unit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table; and,
- c. any change to the emissions unit or its method of operation that would either require an increase in

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

2. The permittee shall only employ coating and cleanup materials in emissions units R012, R013, R014, and R015 which are not photochemically reactive. "Photochemically reactive" is defined in OAC Rule 3745-21-01 (C) (5).
3. The permittee shall operate the water wash, baffles, and filters whenever this emissions units R012, R013, R014, and R015 are in operation.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the annual coating and cleanup material emission limits for emissions units R012, R013, R014, and R015, the permittee shall collect and record the following information each month for all emissions units:

FOR INPUT RATES FROM COATING MATERIAL USAGE IN ALL EMISSIONS UNITS:

- a. the Company identification for each coating material employed;
- b. a determination of whether or not the coating is photochemically reactive;
- c. the number of gallons of each coating material employed;
- d. the OC content of each coating material in lbs OC/gallon as applied;
- e. the OC input rate for each coating material in tons/month [(c) x (d)/2000]; and,
- f. the total OC input rate for all coating materials, in tons/month [summation of (e)].

FOR INPUT RATES FROM CLEANUP MATERIAL USAGE IN ALL EMISSIONS UNITS:

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

- g. the Company identification of each cleanup material employed;
- h. a determination of whether or not the cleanup material is photochemically reactive;
- i. the number of gallons of each cleanup material employed;
- j. the OC content of each cleanup material, in pounds/gallon;
- k. the OC input rate for each cleanup material, in tons/month $[(i) \times (j) / 2000]$; and,
- l. the total OC input rate for all cleanup material, in tons/month [summation of (k)].

THE COMBINED INPUT RATES FROM ALL COATING AND CLEANUP IN ALL EMISSIONS UNITS:

- m. the total OC input rate for all coatings and cleanup materials, in tons/month $[(f) + (l)]$; and,
 - n. beginning after the first 12 calendar months of operation following the issuance of this permit, the total OC input rate/rolling 12-month period [calculated as follows: input/rolling 12-month period = (m) from preceding 11 months + (m) for the current month]. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC input rate for each calendar month.
2. The permittee shall maintain daily records that document any time periods when the water wash, baffles, or filters were not in service when the emissions unit was in operation.
 3. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

21

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

D. Reporting Requirements

1. The actual annual OC emissions data for emissions units R012, R013, R014, and R015 shall be reported pursuant to the fee emissions report required by OAC 3745-78-02 (A).
2. The compliance status of the emissions units shall be reported pursuant to the annual certification required by OAC Rule 3745-77-07 (C) (5).
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the water wash, baffles, or filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. The permittee shall submit quarterly written reports for emissions units R012, R013, R014, and R015 of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

E. Testing Requirements/Compliance Methods Determination

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements and Air Emissions Summary of these terms

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations

R012: 15.0 lbs OC/hour from all coating materials

173.0 lbs OC/month from all cleanup materials

66.7 TPY from all coatings and cleanup materials

R013: 15.0 lbs OC/hour from all coating materials

173.0 lbs OC/month from all cleanup materials

66.7 TPY from all coatings and cleanup materials

R014: 15.0 lbs OC/hour from all coating materials

173.0 lbs OC/month from all cleanup materials

66.7 TPY from all coatings and cleanup materials

R015: 15.0 lbs OC/hour from all coating materials

173.0 lbs OC/month from all cleanup materials

66.7 TPY from all coatings and cleanup materials

Applicable Compliance Method

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

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

b. Emission Limitations

Group limit

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

R012, R013, R014, R015: 124.0 TPY based on a rolling, 12-month summation of OC input rates from all coating and cleanup materials

Applicable Compliance Method

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

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

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

2. Emission Limitation (all emissions units)

0.10 lb/hr particulate emissions, 0.44 ton/yr

Applicable Compliance Method

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

E = particulate matter emissions rate (lbs/hr)

Facility Name: **Budd Company, Plastics Division**

Application Number: **03-3051**

Date: **May 12, 1999**

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

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

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

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

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

3. Emission Limitation (all emissions units)

0 percent opacity as a six minute average.

Applicable Compliance Method

OAC 3745-17-03(B) (1).

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. Miscellaneous Requirements

1. The terms and conditions in this permit shall supersede all requirements in PTI 03-5217.