

Synthetic Minor Determination and/or  Netting Determination

Permit To Install: **08-04807**

**A. Source Description**

Alpine Products Manufacturing Company, Inc. coats miscellaneous metal parts for a variety of industry and military purposes. Alpine submitted a permit to install application for the installation of a new paint booth and to obtain synthetic minor limitations on HAPS to stay out of the MACT (Subpart MMMM).

**B. Facility Emissions and Attainment Status**

Alpine is located in Montgomery County which is non-attainment for ozone and PM-2.5. The emission calculations were based on Alpine complying with OAC 3745-21-09(U)(2)(e)(i) which allows them to use 8 gallons per day of coating per booth. The coating with the highest VOC content was used to demonstrate worst case VOC emissions.

	Potential to Emit			Actual/Requested Allowable		
	VOC	Ind. HAP	Combined HAP	VOC	Ind. HAP	Combined HAP
K001	9.49	4.088	5.548	32.83	4.9 (MIBK)	6.65
K002	9.49	4.088	5.548			
K003	9.49	4.088	5.548			
K004	9.49	4.088	5.548			
K005	9.49	4.088	5.548			
K006	9.49	4.088	5.548			
K007	9.49	4.088	5.548			
K008	9.49	4.088	5.548			
K009	9.49	4.088	5.548			
K010	9.49	4.088	5.548			
* cleanup	10.08	0	0		0	0
L002	2.8	2.8	2.8	2.8	2.8 (TCE)	2.8
De minimis (Chrome plating)	0	0.1	0.1	0	0.1	0.1
Total:	107.78	43.78	58.38	35.63	7.8	9.55

**C. Source Emissions**

While potential emissions of HAP and VOC are greater than major source threshold, past usage records show facility wide actual emissions well below.

**D. Conclusion**

Federally enforceable emission limitations have been established to maintain Alpine's actual emissions below 9.9 TPY for any individual HAP, 24.9 for combined HAPs, and 32.83 TPY for VOCs.



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 08-04807**

**Fac ID: 0857731991**

**DATE: 11/22/2006**

Alpine Products  
Tom Speros  
2030 Drill Ave.  
Dayton, OH 45414

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, 43266-0149.

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 **\$1100** 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 Regional Planning Commission

KY

IN

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04807 FOR AN AIR CONTAMINANT SOURCE FOR  
Alpine Products**

On 11/22/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Alpine Products**, located at **2030 Drill Ave, Dayton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04807:

**new metal painting system.**

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 08-04807**

Application Number: 08-04807  
Facility ID: 0857731991  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Alpine Products  
Person to Contact: Tom Speros  
Address: 2030 Drill Ave.  
Dayton, OH 45414

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

**2030 Drill Ave  
Dayton, Ohio**

Description of proposed emissions unit(s):

**New metal painting system.**

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

Director

**Alpine Products**

**Facility ID: 0857731991**

**PTI Application: 08-04807**

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

**Part I - GENERAL TERMS AND CONDITIONS**

**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,

**Alpine Products****Facility ID: 0857731991****PTI Application: 08-04807****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.

**Alpine Products**

**PTI Application: 08-04807**

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

**Facility ID: 0857731991**

## **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 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

**Alpine Products****Facility ID: 0857731991****PTI Application: 08-04807****Issued: To be entered upon final issuance**

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

### **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>
VOC	32.83
Individual HAP	9.9
Combined HAP	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) - Paint Spray Booth No. 1**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i), and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart Mmmm)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting

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requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

Emissions Unit ID: **K001**

- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

#### **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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

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- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:

**Alpine Products**

DTL Application: 08 04907

**Facility ID: 0857731991**Emissions Unit ID: **K001**

8 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

## b. Emissions Limitation:

The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

## c. Emissions Limitation:

9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-01903, issued October 3, 1990. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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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) - Paint Spray Booth No. 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart M)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the

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material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

Emissions Unit ID: **K002**

- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

#### **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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the

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following information:

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **K002**

- a. Emissions Limitation:  
8 gallons per day total coating usage
- Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.1.
- b. Emissions Limitation:  
The volatile organic compound emissions rates from K001,K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.
- Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.2.
- c. Emissions Limitation:  
9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.
- Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-01903, issued October 3, 1990. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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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 - (K003) - Paint Spray Booth No. 3**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart Mmmm)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the

Emissions Unit ID: **K003**

material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

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- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

**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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the

Emissions Unit ID: K003

following information:

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

## **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

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- a. Emissions Limitation:  
8 gallons per day total coating usage

Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.1.

- b. Emissions Limitation:  
The volatile organic compound emissions rates from K001,K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.2.

- c. Emissions Limitation:  
9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.

Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-01903, issued October 3, 1990. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

**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 - (K004) - Paint Spray Booth No. 4**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart M)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting

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requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

Emissions Unit ID: **K004**

- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

#### **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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

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- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:

Emissions Unit ID: **K004**

8 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

b. Emissions Limitation:

The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

c. Emissions Limitation:

9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-01903, issued October 3, 1990. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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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 - (K005) - Touch Up Booth**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart MMMM)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the

Emissions Unit ID: **K005**

material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

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- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

**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 30 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include the

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following information:

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **K005**

- a. Emissions Limitation:  
8 gallons per day total coating usage  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.1.
- b. Emissions Limitation:  
The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.2.
- c. Emissions Limitation:  
9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-01903, issued October 3, 1990. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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

- 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 - (K006) - Paint Spray Booth No. 6**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart Mmmm)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

- None

**B. Operational Restrictions**

- The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting

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requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

Emissions Unit ID: **K006**

- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

#### **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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

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- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:

**Alpine Products**

DTL Application: 08 04907

**Facility ID: 0857731991**Emissions Unit ID: **K006**

8 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

## b. Emissions Limitation:

The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

## c. Emissions Limitation:

9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-03074, issued July 13, 1994. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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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 - (K007) - Paint Spray Booth No. 7**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart Mmmm)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the

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material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

#### **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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the

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following information:

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **K007**

- a. Emissions Limitation:  
8 gallons per day total coating usage  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.1.
- b. Emissions Limitation:  
The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.2.
- c. Emissions Limitation:  
9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-03074, issued July 13, 1994. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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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 - (K008) - Paint Spray Booth No. 9**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart Mmmm)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the

Emissions Unit ID: **K008**

material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

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- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

**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 30 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include the

Emissions Unit ID: K008

following information:

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

## **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

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- a. Emissions Limitation:  
8 gallons per day total coating usage

Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.1.

- b. Emissions Limitation:  
The volatile organic compound emissions rates from K001,K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.2.

- c. Emissions Limitation:  
9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.

Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-03732, issued December 3, 1997. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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

- 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 - (K009) - Paint Spray Booth No. 10**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart M)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

- The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting

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requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

Emissions Unit ID: **K009**

- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

#### **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 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

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- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:

Emissions Unit ID: **K009**

8 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

b. Emissions Limitation:

The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

c. Emissions Limitation:

9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.
2. The requirements of this permit supercede the requirements of PTI 08-03732, issued December 3, 1997. This permit is a chapter 31 modification to include federally enforceable facility wide synthetic minor limitations for VOCs and HAPs.

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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 - (K010) - Paint Booth No. 11**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B).
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart MMMM)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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>

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the

Emissions Unit ID: **K010**

material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
  - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for the entire facility:
  - a. The company identification of each coating and cleanup material employed.

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- b. The amount of each coating and cleanup material employed, in gallons.
- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

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

**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 30 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include the

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following information:

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

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 that specify the actual total VOC emissions, individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission date from this facility in the annual fee emission report.
4. The permittee shall submit an annual report to the Director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The Director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **K010**

- a. Emissions Limitation:  
8 gallons per day total coating usage  
  
Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.1.
- b. Emissions Limitation:  
The volatile organic compound emissions rates from K001,K002, K003, K004, K005, K006, K007, K008, K009 and K010 shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.  
  
Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.2.
- c. Emissions Limitation:  
9.9 tons for each individual HAP per rolling, 12-month period for the entire facility.  
  
Applicable Compliance Method:  
Compliance shall based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:  
24.9 tons for all HAPs combined per rolling, 12-month period for the entire facility.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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 USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so 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.

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

**F. Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding D.4.