



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

12/03/98

CERTIFIED MAIL

02-50-03-0020

RE: Final Chapter 3745-35 Permit To Operate

Wheeling-Pittsburgh Steel Corporation - Canfield Plant
William R. Samples
1134 Market Street
Wheeling, WV 26003

Dear William R. Samples:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Northeast District Office at (330) 425-9171

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-50-03-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Wheeling-Pittsburgh Steel Corporation - Canfield Plant
460 West Main Street
Canfield, OH 44406

of a permit to operate for:

K001 (Paint Line)

Coil coating line: applicator room, curing oven and quench tank; clean-up solvent tank

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coil coating line: applicator room and curing oven with a thermal incinerator for VOC control, quench tank and cleanup solvent tank	OAC rule 3745-21-09 (B) (6) in lieu of OAC rule 3745-21-09 (E)	Coating line VOC emissions from the applicator room and curing oven shall be controlled by a thermal incinerator. The control equipment must have a destruction efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment. See A.2.
	OAC rule 3745-35-07	

2. Additional Terms and Conditions

- 2.a. Coating line VOC emissions from the applicator room and curing oven shall be controlled by a thermal incinerator. The capture and control equipment shall provide not less than an (85.68 %) reduction, by weight, in the overall VOC emissions from the coating line including all VOC emissions from the applicator room, curing oven and coil quench tank.

The emissions of VOC from emissions unit K001, including VOC emissions from cleanup materials, shall not exceed 96.0 tons per year, based upon a rolling 12-month summation of the monthly emissions.

- 2.c. To ensure enforceability of the annual VOC emission limitation during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the monthly emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (tons)
1	8.0
1-2	16.0
1-3	24.0
1-4	32.0
1-5	40.0
1-6	48.0
1-7	56.0
1-8	64.0
1-9	72.0
1-10	80.0
1-11	88.0
1-12	96.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

The emissions of any single HAP from emissions unit K001, including HAP emissions from cleanup materials, shall not exceed 9.9 tons per year, based upon a rolling 12-month summation of the monthly emissions. The emissions of any combination of HAPs from emissions unit K001, including HAPs emissions from cleanup materials, shall not exceed 24.9 tons per year, based upon a rolling 12-month summation of the monthly emissions.

2. Additional Terms and Conditions (continued)

- 2.e. To ensure enforceability of the annual single HAP emission limitation during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the monthly emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of Any Single HAP (tons)
1	1.0
1-2	2.0
1-3	3.0
1-4	4.0
1-5	5.0
1-6	6.0
1-7	7.0
1-8	8.0
1-9	9.0
1-10	9.9
1-11	9.9
1-12	9.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual emission limitation for a single HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.f. To ensure enforceability of the annual combined HAPs emission limitation during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the monthly emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of Any Combination of HAPs (tons)
1	2
1-2	4
1-3	6
1-4	8
1-5	10
1-6	12
1-7	14
1-8	16
1-9	18
1-10	20
1-11	22
1-12	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual emission limitation for combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The total gallons of coating applied in emissions unit K001 shall not exceed 113,900 gallons per year, based upon a rolling 12-month summation of the monthly coating usage.

B. Operational Restrictions (continued)

2. To ensure enforceability of the annual coating usage limitation during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the monthly coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Applied (gallons)
1	9,492
1-2	18,983
1-3	28,475
1-4	37,967
1-5	47,458
1-6	56,950
1-7	66,442
1-8	75,933
1-9	85,425
1-10	94,917
1-11	104,408
1-12	113,900

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage.

3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1150 degrees Fahrenheit.

C. Monitoring and/or Record Keeping Requirements

1. Monthly records shall be kept of the total gallons of coating applied.
2. Beginning after the first 12 calendar months of operation following issuance of this permit, monthly records shall be kept of the rolling, 12-month summation of the monthly coating usage (gallons) for emissions unit K001. Also, during the first 12 calendar months of operation following issuance of this permit, monthly records shall be kept of the cumulative coating usage (gallons) for emissions unit K001.
3. To ensure compliance with the yearly VOC and HAP(s) emission limits, the following monthly records shall be kept:
 - 3.a. For each coating and cleanup material used in emissions unit K001:
 - i. Name or ID of each coating/cleanup material.
 - ii. Amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in pounds per month.
 - iii. Amount of each coating used, "CT" in pounds per month.
 - iv. VOC content of each coating/cleanup material, in pounds of VOC per pound of coating applied (PVPC) and pounds of VOC per pound of cleanup material used (PVPCM).
 - v. For each cleanup material, the amount of VOC emitted, in pounds per month, to be defined as "CMVOC" and calculated as follows: $CMVOC = CM * PVPCM$
 - vi. For each coating, the amount of VOC emitted, before application of the control device, in pounds per month, to be defined as "CVOC" and calculated as follows:
 $CVOC = CT * PVPC$
 - vii. For each coating, the amount of VOC emitted, after application of the control device, in pounds per month, to be defined as "MV". "MV" shall be calculated as follows:
 $MV = CVOC * (1.0 - D)$, where $D = 0.8568$, overall control efficiency, in decimal form.
 - viii. Name of all HAPs contained in each coating/cleanup material.
 - ix. Content of each HAP in each cleanup material, in units of pounds HAP/pound cleanup material, to be defined as "PHPM".
 - x. Content of each HAP in each coating, in units of pounds HAP/pound coating, to be defined as "PHPC".
 - xi. For each HAP in each cleanup material, the amount of that HAP emitted in units of pounds per month, to be defined as "PMCM". "PMCM", for each HAP, shall be calculated as follows:
 $PMCM = CM * PHPM$
 - xii. For each HAP in each coating, the amount of that HAP emitted, before application of the control device, in units of pounds per month, to be defined as "PUMH". "PUMH", for each HAP, shall be calculated as follows:
 $PUMH = CT * PHPC$
 - xiii. For each HAP in each coating, the amount of that HAP emitted, after application of the control device, in units of pounds per month, to be defined as "MH", calculated as follows:
 $MH = PUMH * (1.0 - D)$, where $D = 0.8568$, overall control efficiency, in decimal form.

C. Monitoring and/or Record Keeping Requirements (continued)

- 3.b.** The total amount of VOC emitted (TVOC) from emissions unit K001, in tons, i.e., the total cleanup material VOC (TCMVOC) plus total coating VOC (TMV), represented by the following equation:
$$TVOC = TCMVOC + TMV$$
where
TCMVOC = total monthly emissions of VOC from the cleanup material, in tons, equal to the sum, from $i = 1$ to $i = n$, of $(CMVOC)_i$, divided by 2000 lbs,
 i = subscript denoting an individual cleanup material, and
 n = the number of different cleanup materials
and
TMV = total monthly emissions of VOC from the coating operation, after application of the control device, in tons, equal to the sum, from $i = 1$ to $i = n$, of $(MV)_i$, divided by 2000 lbs,
 i = subscript denoting an individual coating, and
 n = the number of different coatings.
- 3.c.** For each single HAP, the total amount of that HAP emitted from the coating operation, in tons, after application of the control device, calculated according to the following equation:
$$SHAP = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (MH)_i, \text{ divided by } 2000 \text{ lbs,}$$
where
SHAP = total monthly emissions for a single HAP from the coating operation, after application of the control device, in tons,
 $(MH)_i$ = total emissions of a single HAP from each coating, after application of the control device, in pounds,
 i = subscript denoting an individual coating, and
 n = the total number of different coatings containing the HAP.
- 3.d.** For each single HAP, the total amount of that HAP emitted (TSHAP) from emissions unit K001, in tons, i.e., the total of coating HAP (SHAP) plus cleanup material HAP (TPMCM), represented by the following equation:
$$TSHAP = SHAP + TPMCM,$$
where
SHAP = total monthly emissions for a single HAP from the coating operation, after application of the control device, in tons,
and
TPMCM = total monthly emissions for a single HAP in the cleanup material, in tons, calculated according to the following equation:
$$TPMCM = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (PMCM)_i, \text{ divided by } 2000 \text{ lbs, where}$$
$$(PMCM)_i = \text{total emissions of a single HAP from each cleanup material, in pounds,}$$
$$i = \text{subscript denoting an individual cleanup material, and}$$
$$n = \text{the total number of different cleanup materials containing the HAP.}$$
- 3.e.** For the combined HAPs, the total combined HAP emissions from the coating operation, after application of the control device, calculated according to the following equation:
$$THAP = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (SHAP)_i,$$
where
THAP = monthly total HAPs emissions from the coating operation, after application of the control device, in tons,
 $(SHAP)_i$ = total monthly emissions for a single HAP, after application of the control device, in tons,
 i = subscript denoting an individual HAP, and
 n = the total number of different HAPs.
- 3.f.** For the combined HAPs, the total amount of HAPs emitted (TCHAP) from emissions unit K001, in tons, i.e., the total coating HAPs (THAP) plus cleanup material HAPs (TCPMCM), represented by the following equation:
$$TCHAP = THAP + TCPMCM$$
where
THAP = total monthly HAPs emissions from the coating operation, after application of the control device, in tons
and
TCPMCM = total monthly emissions of combined HAPs in the cleanup material, in tons, calculated according to the following equation:
$$TCPMCM = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (TPMCM)_i, \text{ where}$$
$$(TPMCM)_i = \text{total emissions of a single HAP from each cleanup material, in tons,}$$
$$i = \text{subscript denoting an individual cleanup material, and}$$
$$n = \text{the total number of different cleanup materials containing the HAP.}$$

C. Monitoring and/or Record Keeping Requirements (continued)

- 3.g.
 - i. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions for emissions unit K001.
 - ii. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the single HAP emissions for emissions unit K001.
 - iii. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of total HAPs emissions.
 - iv. Also, during the first 12 calendar months of operation following issuance of this permit, the cumulative emissions of VOC and all single and total HAPs for emissions unit K001.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day:
 - 5.a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1150 degrees Fahrenheit.
 - 5.b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative applied coating usage limitation. The deviation (excursion) reports shall be submitted in accordance with section 3 of Part I of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. The deviation (excursion) reports shall be submitted in accordance with section 3 of Part I of the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for single and combined HAP(s) and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. The deviation (excursion) reports shall be submitted in accordance with section 3 of Part I of the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. The deviation (excursion) reports shall be submitted in accordance with section 3 of Part I of the General Terms and Conditions of this permit.
5. The permittee shall submit an annual report which identifies the total actual emissions of VOC for emissions unit K001. The report shall be submitted annually, i.e., by January 31 of each year, and shall cover the previous calendar year.
6. The permittee shall submit an annual report which identifies the total actual emissions of each single HAP for emissions unit K001. The report shall be submitted annually, i.e., by January 31 of each year, and shall cover the previous calendar year.
7. The permittee shall submit an annual report which identifies the total actual emissions of combined HAPs for emissions unit K001. The report shall be submitted annually, i.e., by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing of emissions unit K001 to demonstrate compliance with the overall VOC emission reduction and control equipment destruction efficiency requirements in Section A.1. of these terms and conditions. The testing shall be conducted in accordance with the following method(s):
 - 1.a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit renewal.

E. Testing Requirements (continued)

- 1.b. The emission testing shall be conducted to demonstrate compliance with the ninety per cent, by weight, destruction efficiency limitation for the thermal incinerator and the capture and control equipment requirement that there be not less than (85.68 %) reduction, by weight, in overall VOC emissions from the coating line.
- 1.c. The following test method(s) shall be employed to determine the mass emission rates: for VOC, Method 25. The test method(s) which must be employed to demonstrate compliance with the allowable emission limitations for VOC are specified below.
- 1.d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- 2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

- 3. Compliance with the emission limitation(s) in Section A.2. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

The emissions of VOC from emissions unit K001, including VOC emissions from cleanup materials, shall not exceed 96.0 tons per year, based on a rolling 12-month summation of the monthly emissions.
Applicable Compliance Method

USEPA Methods 24 shall be used to determine the VOC contents for 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 until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Compliance shall be based upon the record keeping specified in section C.3. and shall be the rolling, 12-month summation of VOC emissions for emissions unit K001.

- 3.b. **Emission Limitation**

The emissions of any single HAP from emissions unit K001, including HAP emissions from cleanup materials, shall not exceed 9.9 tons per year, based on a rolling 12-month summation of the monthly emissions. The emissions of any combination of HAPs from emissions unit K001, including HAPs emissions from cleanup materials, shall not exceed 24.9 tons per year, based on a rolling 12-month summation of the monthly emissions.

Applicable Compliance Method

Formulation data shall be used to determine the HAP content of the coatings and cleanup materials. Compliance shall be based upon the record keeping specified in section C.3. and shall be the rolling, 12-month summation of HAP(s) emissions for emissions unit K001.

F. Miscellaneous Requirements

1. Sections A. - F. constitute the federally enforceable portions of these permit terms and conditions, pursuant to OAC rule 3745-35-07.