



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

07/02/98

CERTIFIED MAIL

13-18-11-0513

RE: Final Chapter 3745-35 Permit To Operate

American Japanning Inc.
James Miller
4917 Van Epps Rd.
Brooklyn Height, OH 44131

Dear James Miller:

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. 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 Cleveland Division of Air Pollution Control at (216) 664-2324.

Very truly yours,

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

cc: Cleveland Division of Air Pollution Control
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 7/2/98

Facility ID: 13-18-11-0513

Expiration Date: 07/02/03

FINAL ISSUE

This document constitutes issuance for

American Japanning Inc.
4917 Van Epps Rd.
Brooklyn Height, OH 44131

of a permit to operate for:

K005 (Spin Dip Coating Line)
Centrifugal Spin Dip Machine

PART I General Terms & Conditions

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.

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.

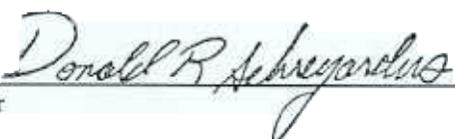
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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 Cleveland Division of Air Pollution Control.

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

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>
Dip coating line for misc. metal parts	OAC Rule 3745-35-07	See Section A.2
	OAC Rule 3745-21-09 (U)(2)	See Section B.1.

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed the following limits
 - i. 0.125 ton per calendar month; and
 - ii. 1.5 tons per year.
- 2.b The emissions of each single hazardous air pollutant (HAP) from this emissions unit shall not exceed the following limits:
 - i. 0.02 ton per calendar month; and
 - ii. 0.25 ton HAP per year.
- 2.c The emissions of combined hazardous air pollutants (HAPs) from this emissions unit shall not exceed the following limits:
 - i. 0.02 ton per calendar month; and
 - ii. 0.25 ton per year.
- 2.d The facility-wide, combined emissions from emissions units of K001, K002, K003, K004, and K005 shall not exceed the following limits:
 - i. 90 tons VOC per year;
 - ii. 9.75 tons of each single HAP per year; and
 - iii. 24.25 tons of the combination of HAPs per year.

B. Operational Restrictions

1. The permittee shall not employ more than ten (10) gallons of coatings in this coating line per day.

C. Monitoring and/or Record Keeping 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 and cleanup material;
 - b. The VOC content of each coating and cleanup material added to the dip line, in pounds per gallon;
 - c. The single HAP content of each coating and cleanup material added to the dip line, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material added to the dip line, in pounds per gallon;
 - e. The number of gallons of each coating and cleanup material added to the dip line;
The total number of gallons of all coatings added to the dip line;
 - g. The total VOC emissions from all coatings and cleanup materials added to the dip line, in pounds or tons;
 - h. The emissions of each single HAP from all coatings and cleanup materials added to the dip line, in pounds or tons; and
 - i. The emissions of combined HAPs from all coatings and cleanup materials added to the dip line, in pounds or tons.
2. The permittee shall collect and record the following information for emissions units K001, K002, K003, K004, and K005 combined each month:
 - a. The total VOC emissions from all coatings and cleanup materials added to the dip line, in pounds or tons;
 - b. The emissions of each single HAP from all coatings and cleanup materials added to the dip line, in pounds or tons; and
 - c. The emissions of combined HAPs from all coatings and cleanup materials added to the dip line, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall notify the Director of any daily or monthly record showing the exceedance of any VOC or HAP(s) emission limitation listed in this permit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which summarize the emissions of VOC, each single HAP, and total HAPs from this emissions unit and emissions units K001, K002, K003, K004, and K005 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. 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):

- a. Emissions Limitation:
0.125 tons/month of VOC
0.0208 ton/month of each single HAP
0.0208 ton/month of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar month.

- b. Emissions Limitation:
1.5 tons/yr of VOC
0.25 ton/yr of each single HAP
0.25 tons/yr of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year.

- c. Emission Limitation:
90 tons/yr of VOC for emissions units K001 - K005 combined
9.75 tons/yr of each single HAP for emissions units K001 - K005 combined
24.25 tons/yr of combined HAPs for emissions units K001 - K005 combined

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.2 and shall be the sum of the monthly emission rates for the calendar year.

2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and cleanup materials;
3. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC Rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 7/2/98

Facility ID: 13-18-11-0513

Expiration Date: 07/02/03

FINAL ISSUE

This document constitutes issuance for:

American Japanning Inc.
4917 Van Epps Rd.
Brooklyn Height, OH 44131

of a permit to operate for:

K004 (PVDF Booths, Oven 4)
Architectural PVDF Spray Paint Line

PART I General Terms & Conditions

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:

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.

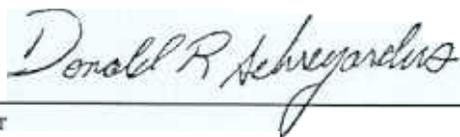
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Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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 Cleveland Division of Air Pollution Control.

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, reading "Donald R. Scheyardus", is written over a light blue rectangular background. The signature is positioned above a horizontal line.

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>
Two Binks spray booths (#5 & #6) and a high temperature batch oven for misc. metal parts	OAC Rule 3745-35-07	See Section A.2
	OAC Rule 21-09 (U)(2)	See Section B.1

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed the following limits:
 - i. 1.875 tons per calendar month; and
 - ii. 22.5 tons per year.
- 2.b The emissions of each single hazardous air pollutant (HAP) from this emissions unit shall not exceed the following limits:
 - i. 0.1975 ton per calendar month; and
 - ii. 2.375 tons HAP per year.
- 2.c The emissions of combined hazardous air pollutants (HAPs) from this emissions unit shall not exceed the following limits:
 - i. 0.5 ton per calendar month; and
 - ii. 6.0 tons per year.
- 2.d The facility-wide combined emissions from emissions units K001, K002, K003, K004, and K005 shall not exceed the following limits:
 - i. 90 tons VOC per year;
 - ii. 9.75 tons of each single HAP per year; and
 - iii. 24.25 tons of the combination of HAPs per year.

B. Operational Restrictions

1. The permittee shall not employ more than ten (10) gallons of coatings in this coating line per day.

C. Monitoring and/or Record Keeping 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 and cleanup material;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon;
 - c. The single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. The number of gallons of each coating and cleanup material employed;
 - f. The total number of gallons of all coatings employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - h. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information for emissions units K001, K002, K003, K004, and K005 combined each month:
 - a. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - b. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
 - c. The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall notify the Director of any daily or monthly record showing the exceedance of any VOC or HAP(s) emission limitation listed in this permit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which summarize the emissions of VOC, each single HAP, and total HAPs from this emissions unit and emissions units K001, K002, K003, K004, and K005 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.2 and Section B of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:
1.875 tons/month of VOC
0.1975 ton/month of each single HAP
0.5 ton/month of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar month.
 - b. Emissions Limitation:
22.5 tons/yr of VOC
2.375 ton/yr of each single HAP
6.0 tons/yr of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year.
 - c. Emission Limitation:
90 tons/yr of VOC for emissions units K001 - K005 combined
9.75 tons/yr of each single HAP for emissions units K001 - K005 combined
24.25 tons/yr of combined HAPs for emissions units K001 - K005 combined

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.2 and shall be the sum of the monthly emission rates for the calendar year.
2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.
3. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC Rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 7/2/98

Facility ID: 13-18-11-0513

Expiration Date: 07/02/03

FINAL ISSUE

This document constitutes issuance for:

American Japanning Inc.
4917 Van Epps Rd.
Brooklyn Height, OH 44131

of a permit to operate for:

K003 (Booth #3,4, Oven #3)
Miscellaneous Parts Spray Paint Line

PART I General Terms & Conditions

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

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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.

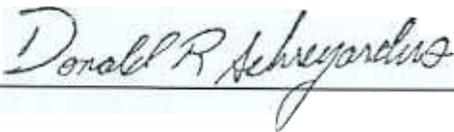
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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 Cleveland Division of Air Pollution Control.

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

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Two Binks spray booths (#3 & #4) and a oven (Oven #3) for misc. metal parts	OAC Rule 3745-35-07	See Section A.2
	OAC Rule 3745-21-09 (U)(2)	See Section B.1

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed the following limits

1.87 tons per calendar month; and

- ii. 22.5 tons per year.

- 2.b The emissions of each single hazardous air pollutant (HAP) from this emissions unit shall not exceed the following limits:

- i. 0.1975 ton per calendar month; and

- ii. 2.375 tons HAP per year.

The emissions of combined hazardous air pollutants (HAPs) from this emissions unit shall not exceed the following limits:

- i. 0.5 ton per calendar month; and

- ii. 6.0 tons per year.

The facility-wide combined emissions from emissions units K001, K002, K003, K004, and K005 shall not exceed the following limits:

- i. 90 tons VOC per year;

- ii. 9.75 tons of each single HAP per year; and

- iii. 24.25 tons of the combination of HAPs per year.

B. Operational Restrictions

1. The permittee shall not employ more than ten (10) gallons of coatings in this coating line per day.

C. Monitoring and/or Record Keeping 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 and cleanup material;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon;
 - c. The single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. The number of gallons of each coating and cleanup material employed;
The total number of gallons of all coatings employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - h. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information for emissions units K001, K002, K003, K004, and K005 combined each month:
 - a. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - b. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
 - c. The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall notify the Director of any daily or monthly record showing the exceedance of any VOC or HAP(s) emission limitation listed in this permit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which summarize the emissions of VOC, each single HAP, and total HAPs from this emissions unit and emissions units K001, K002, K003, K004, and K005 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emissions Limitation:
1.87 tons/month of VOC
0.1975 ton/month of each single HAP
0.5 ton/month of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar month.

- b. Emissions Limitation:
22.5 tons/yr of VOC
2.375 ton/yr of each single HAP
6.0 tons/yr of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year.

- c. Emission Limitation:
90 tons/yr of VOC for emissions units K001 - K005 combined
9.75 tons/yr of each single HAP for emissions units K001 - K005 combined
24.25 tons/yr of combined HAPs for emissions units K001 - K005 combined

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.2 and shall be the sum of the monthly emission rates for the calendar year.

2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and cleanup materials;
3. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC Rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 7/2/98

Facility ID: 13-18-11-0513

Expiration Date: 07/02/03

FINAL ISSUE

This document constitutes issuance for:

American Japanning Inc.
4917 Van Epps Rd.
Brooklyn Height, OH 44131

of a permit to operate for:

K002 (Booth #2, Oven #2)
Miscellaneous Small Parts Spray Paint Line

PART I General Terms & Conditions

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.

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:

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.

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

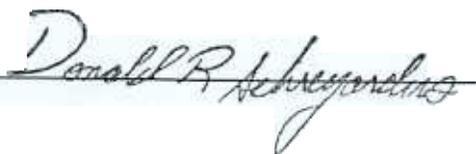
Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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 Cleveland Division of Air Pollution Control.

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

A handwritten signature in cursive script, appearing to read "Donald R. Heywood", is written over a horizontal line. The signature is written in black ink on a light blue background.

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>
A Binks spray booths (#2) and a oven (Oven #2) for misc. metal parts	OAC Rule 3745-35-07	See Section A.2.
	OAC Rule 3745-21-09 (U)(2)	See Section B.1

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed the following limits:
 - i. 2.125 tons per calendar month; and
 - ii. 25.5 tons per year.
- 2.b The emissions of each single hazardous air pollutant (HAP) from this emissions unit shall not exceed the following limits:
 - i. 0.24 ton per calendar month; and
 - ii. 2.85 tons HAP per year.
- 2.c The emissions of combined hazardous air pollutants (HAPs) from this emissions unit shall not exceed the following limits:
 - i. 0.6 ton per calendar month; and
 - ii. 7.2 tons per year.
- 2.d The facility-wide combined emissions from emissions units K001, K002, K003, K004, and K005 shall not exceed the following limits:
 - i. 90 tons VOC per year;
 - ii. 9.75 tons of each single HAP per year; and
 - iii. 24.25 tons of the combination of HAPs per year.

B. Operational Restrictions

1. The permittee shall not employ more than ten (10) gallons of coatings in this coating line per day.

C. Monitoring and/or Record Keeping 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 and cleanup material;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon;
The single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. The number of gallons of each coating and cleanup material employed;
 - f. The total number of gallons of all coatings employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - h. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information for emissions units K001, K002, K003, K004, and K005 combined each month:
 - a. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - b. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
 - c. The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall notify the Director of any daily or monthly record showing the exceedance of any VOC or HAP(s) emission limitation listed in this permit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which summarize the emissions of VOC, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, and K005 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. 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):

a. Emissions Limitation:
2.125 tons/month of VOC
0.24 ton/month of each single HAP
0.6 ton/month of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar month.

b. Emissions Limitation:
25.5 tons/yr of VOC
2.85 ton/yr of each single HAP
7.2 tons/yr of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year.

c. Emission Limitation:
90 tons/yr of VOC for emissions units K001 - K005 combined
9.75 tons/yr of each single HAP for emissions units K001 - K005 combined
24.25 tons/yr of combined HAPs for emissions units K001 - K005 combined

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.2 and shall be the sum of the monthly emission rates for the calendar year.

2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.
3. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC Rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A -F.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 07/02/98

Facility ID: 3-18- .0513

Expiration Date: 07/02/03

FINAL ISSUE

This document constitutes issuance for

American Japanning Inc.
4917 Van Epps Rd.
Brooklyn Height, OH 44131

of a permit to operate for:

K001 (Booth #1, Oven # 1)
Miscellaneous Small Parts Spray Paint Line

PART I General Terms & Conditions

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.

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

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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 Cleveland Division of Air Pollution Control.

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

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>
Two Binks spray booths (#0 & #1) and a oven (Oven #1) for misc. metal parts	OAC Rule 3745-35-07	See Section A.2
	OAC Rule 3745-21-09 (U)(2)	See Section B.1

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed the following limits
 - i. 1.5 tons per calendar month; and
 - ii. 18 tons per year.
- 2.b The emissions of each single hazardous air pollutant (HAP) from this emissions unit shall not exceed the following limits:
 - i. 0.16 ton per calendar month; and
 - ii. 1.9 tons HAP per year.
- 2.c The emissions of combined hazardous air pollutants (HAPs) from this emissions unit shall not exceed the following limits:
 - i. 0.40 ton per calendar month; and
 - ii. 4.8 tons per year.
- 2.d The facility-wide, combined emissions from emissions units of K001, K002, K003, K004, and K005 shall not exceed the following limits:
 - i. 90 tons VOC per year;
 - 9.75 tons of each single HAP per year; and
 - iii. 24.25 tons of the combination of HAPs per year.

B. Operational Restrictions

1. The permittee shall not employ more than ten (10) gallons of coatings in this coating line per day.

C. Monitoring and/or Record Keeping 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 and cleanup material;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon;
 - c. The single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. The number of gallons of each coating and cleanup material employed;
 - f. The total number of gallons of all coatings employed
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - h. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

2. The permittee shall collect and record the following information for emissions units K001, K002, K003, K004 and K005 combined each month:
 - a. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - b. The emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons;
and
 - c. The emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall notify the Director of any daily or monthly record showing the exceedance of any VOC or HAP(s) emission limitation listed in this permit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which summarize the emissions of VOC, each single HAP, and total HAPs from this emissions unit and emissions units K001, K002, K003, K004, and K005 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. 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):

a. Emissions Limitation:
1.5 tons/month of VOC
0.16 ton/month of each single HAP
0.40 ton/month of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar month.

b. Emissions Limitation:
18 tons/yr of VOC
1.9 ton/yr of each single HAP
4.8 tons/yr of combined HAPs

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year.

c. Emission Limitation:
90 tons/yr of VOC for emissions units K001 - K005 combined
9.75 tons/yr of each single HAP for emissions units K001 - K005 combined
24.25 tons/yr of combined HAPs for emissions units K001 - K005 combined

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.2 and shall be the sum of the monthly emission rates for the calendar year.

2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and cleanup materials;
3. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC Rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.

