

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 13-04361

**A. Source Description**

Cleveland Laminating has submitted an application for a new emissions units (K006) at the facility. Cleveland Laminating Corporation was previously a Title V facility but they limited coating usage to opt out of the Title V program by obtaining facility-wide synthetic minor restrictions for emissions units K001, K002, and K005 through PTI 13-04316 issued Final on October 12, 2004. Even though they are installing a new emissions unit, Cleveland Laminating will also be shutting down emissions unit K001 upon startup of the new unit. Consequently, they will be able to retain Synthetic Minor status for Title V purposes by keeping facility emissions below 100 tpy VOC and also avoid Nonattainment New Source Review by restricting emissions from K006 below 100 tpy..

**B. Facility Emissions and Attainment Status**

Based on engineering calculations the maximum potential to emit at 8,760 hours for K006 is 130.6 tons per year of VOCs. Cuyahoga county is currently designed as non-attainment for ozone for the 8-hour standard. This facility is classified as a minor source for Title V purposes due to the issuance of Synthetic Minor PTI 13-04316. The Synthetic Minor restrictions proposed for K006 will limit the PTE to below Title V thresholds as well as less than the 100 tpy major source threshold for Nonattainment NSR.

**C. Source Emissions**

Cleveland Laminating intends to avoid the Title V permitting procedures by limiting the total HAPs for the facility to 23.8 tons per year based on a rolling 12 month summation, single HAPs to 9.9 tons per year and VOC to 93.3 tons per year. These sources have the potential to emit (PTE) more than 100 tpy VOC (2640.3 tpy) when combined, resulting in Title V applicability. In addition, these sources have the PTE more than 10 tpy single HAP and 25 tpy combined HAPs. The permittee has chosen to restrict VOC emissions from these sources below the 100 tpy Title V threshold for VOC and below the 10/25 tpy HAP threshold to avoid Title V and Nonattainment NSR.

**D. Conclusion**

The Cleveland Division of Air Quality recommends approval of this permit because a review of the historical facility material usage data verifies that the actual facility emissions are significantly lower than the theoretical potential emissions. The facility proposes to meet the limitations by limiting the total monthly adhesive usage for all three laminators to 33,000 gallons, with a 0.48 lb/gal VOC content, total HAP limit of 0.12 lb/gal and single HAP limit of 0.050 lb/gal as mixed and applied. The three (3) laminators will be restricted by federally enforceable limitations in the PTI. With the enforceable permit terms and conditions limiting operations, this permit is a "Synthetic Minor" and, therefore, not subject to either the Title V permitting requirements or Nonattainment NSR.



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 13-04561

**Fac ID:** 1318000242

**DATE:** 8/4/2005

Cleveland Laminating Corporation  
Steve Williams  
2909 East 79th Street  
Cleveland, OH 44104

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 **\$200** 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

CLAA

PA

**CUYAHOGA COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04561** FOR AN AIR CONTAMINANT SOURCE FOR  
**Cleveland Laminating Corporation**

On 8/4/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Cleveland Laminating Corporation**, located at **2909 East 79th Street, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04561:

**Installation of new laminator emissions unit K006.**

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.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,  
Cleveland, OH 44114 [(216)664-2324]



**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 13-04561**

Application Number: 13-04561  
Facility ID: 1318000242  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Cleveland Laminating Corporation  
Person to Contact: Steve Williams  
Address: 2909 East 79th Street  
Cleveland, OH 44104

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2909 East 79th Street  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Installation of new laminator emissions unit K006.**

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

## **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 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.)

### **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,

**Cleveland Laminating Corporation**

**Facility ID: 1318000242**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

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

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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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

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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>
<b>K006:</b>	
VOC	31.1
 <b>Facility:</b>	
VOC	93.3
Single HAP	9.9
Combined HAP	23.8

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Laminator coater and infrared flash-off oven	OAC rule 3745-31-05(A)(3)	29.8 lb/hr VOC Volatile organic compound (VOC) content of the coatings shall not exceed 0.48 pound per gallon,  The requirements of this rule include compliance with OAC Rule 3745-31-05 (C)
	OAC rule 3745-21-09(F)	The requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT, and Nonattainment NSR.	See section A.2.a through section A.2.b.  31.1 tons VOC/rolling, 12-month period

**2. Additional Terms and Conditions**

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- 2.a** The maximum annual VOC emissions generated at this facility shall not exceed 93.3 tons per year, based on a rolling, 12-month summation of emissions.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions and material usage generated at this facility shall not exceed 9.9 tons per year for any single HAP and 23.8 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The current list of emissions units at this facility are K001, K002, and K005. Emissions unit K001 will be removed prior to installation of K006.

**B. Operational Restrictions**

1. The permittee shall not exceed 31.1 tons VOC material usage for this emissions unit, based on a rolling, 12 - month summation of VOC material usage per year, determined by summing (C.1.d) /2000 lbs/ton for each coating.

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

<u>Months</u>	<u>Maximum Allowable Cumulative VOC Material Usage</u>
1	3
1 - 2	5.6
1 - 3	8.2
1 - 4	10.8
1 - 5	13.4
1 - 6	16.0
1 - 7	18.6
1 - 8	21.2
1 - 9	23.8
1 - 10	26.4
1 - 11	29.0
1 - 12	31.1

After the first 12 calendar months of operation following issuance of this permit,

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compliance with the annual VOC material usage limitation shall be based upon a rolling, 12-month summation of the VOC material usage figures.

2. The permittee shall not exceed 93.3 tons VOC material usage for the emissions units at this facility, based on a rolling, 12 - month summation of VOC material usage , determined by summing (C.1.d)/ 2000 lbs/ton for each coating employed for all emissions units at this facility.
3. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual HAP and VOC emissions calculated from material usage records over the previous twelve calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

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

1. The permittee shall collect and record the following information monthly for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content, in lbs/gal, of each coating, as applied;
  - c. the amount, in gallons, of each coating;
  - d. the VOC emission rate and VOC material usage, in lbs/month, determined by summing (b x c) for each coating employed;
  - e. the VOC content, in lbs/gal less water and exempt solvents, of each coating, as applied;
  - f. the individual \* HAP and combined HAP content in lbs/gal, for each coating material employed; and
  - g. the total individual HAP and combined HAP emissions and material usage for each coating material employed, in lbs/month [sum of (f x c) for all adhesives employed].
- \* 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 air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept

Emissions Unit ID: **K006**

on an emissions unit - by - emissions unit basis.

2. The permittee shall maintain monthly records of the following for the facility (see A.2.c):
  - a. the rolling, 12-month individual HAP material usage and emissions calculated by summing the records of C.1.g in pounds per month for the emissions units at this facility;
  - b. the rolling, 12-month combined HAP material usage and emissions from all materials employed calculated by summing the records of C.1.g in pounds per month for the emissions units at this facility;
  - c. the rolling, 12-month VOC emission rate calculated by summing the records of C.1.d. in pounds per month for the emissions units at this facility.
  - d. the rolling, 12-month VOC material usage calculated by summing the records of C.1.d. in pounds per month for the emissions units at this facility.
3. The permit to install for this emissions unit (K006) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (ug/m3): 35210.6

Maximum Hourly Emission Rate (lbs/hr): 2.6 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49.72

MAGLC (ug/m3): 838.3

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will be satisfied. If, upon evaluation, the permittee determines that the

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"Air Toxic Policy" will not be satisfied, the permittee will not make the change.

Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total HAP and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility (see A.2.c) :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 23.8 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month VOC emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;
  - d. an identification of each month during which the rolling, 12-month VOC material usage exceed 93.3 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

4. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ which identify all exceedances of the rolling, 12-month VOC material usage limitation (31.1 tons VOC material per rolling 12-months) for this emissions unit and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC material usage levels.

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days

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following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

**E. Testing Requirements**

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

- a. Emission Limitation:  
29.8 lbs VOC /hr

Applicable Compliance Method:

Compliance with the maximum hourly VOC emissions limitation (potential to emit) shall be assumed if company does not exceed the lbs VOC /gal limitation. Pound per hour limitation determined using the following equation:

$$\text{VOC (lb/hr)} = (0.48 \text{ lb VOC/gal}) * (62 \text{ gal/hr})$$

- b. Emission Limitation:  
31.1 tpy VOC per rolling, 12-month period
- Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:
- $$\text{VOC (tpy)} = (\text{summation of Section C.1.d. per rolling, 12-month period}) / 2000 \text{ lbs/ton}$$
- c. Emission Limitation:  
93.3 tons VOC per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.2.
- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.2.
- e. Emission Limitation:  
23.8 tons combined HAP emissions per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.2.
- f. Operational Limitation:  
VOC content of all coatings shall not exceed 0.48 pound VOC per gallon of coating
- Applicable Compliance Method:  
Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Method 24 (for coatings) of 40 CFR, Part 60, Appendix

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**Cleve**

**PTI A**

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

A.

Emissions Unit ID: **K006**

**Cleve**

**PTI A**

Emissions Unit ID: **K006**

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- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K002, K005, and K006

**F. Miscellaneous Requirements**

None