



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

09/17/98

**CERTIFIED MAIL**

13-18-40-8064

**RE: Final Chapter 3745-35 Permit To Operate**

Great Lakes Truck Equipment  
Daniel Oliver  
1750 East Highland Road  
Twinsburg, OH 44087

Dear Daniel Oliver:

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

If you have any questions, please contact the 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: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K007 (Sanding, grinding and priming operation  
Sanding, grinding and priming operation

### 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.

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**

- 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
Truck Prep Station	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 0.551 pound per hour.
	OAC Rule 3745-31-05 PTI No. 13-3235	The maximum allowable emission rate for this emissions unit is 21 pounds of volatile organic compounds (VOC) per day, 3.83 tons VOC per year, and 2.41 tons particulate per year.
	OAC Rule 3745-35-07	See section B.2. See section A.2.a - A.2.d.

## 2. Additional Terms and Conditions

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- 0.82 ton per month; and
  - ii. 9.9 tons per year.
- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- 2.0 tons per month; and
  - ii. 24.5 tons per year.
- 2.d The total emissions from the entire facility shall not exceed the following limits:
- 47.3 tons per year of VOC
  - 9.9 tons per year of any individual HAP; and
  - 24.5 tons per year of combined HAPs

## B. Operational Restrictions

1. The permittee shall not exceed the following material usage for the entire facility:
  - a 21,528 gallons per year of coatings
  - b 160 gallons per year of masking compounds; and
  - c 936 gallons per year of surface cleaners.
2. The permittee shall not employ more than three (3) gallons of coatings per day in this emissions unit
3. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

## 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 employed;
  - b the VOC content, in pound per gallon, of each coating and cleanup material, as applied;
  - c the number of gallons of each coating and cleanup material employed,
  - d the total number of gallons of all coatings employed;
  - e the VOC emissions from each coating and cleanup material employed, in pounds or tons; and the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

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

2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual HAP content of each coating and cleanup material, in pounds per gallon;
  - d. the combined HAP 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons; and
  - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons
3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year.
  - b. the total masking compound usage, in gallons per year.
  - c. the total surface cleaner usage, in gallons per year

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the total usage of coatings exceeded three (3) gallons per day, and the actual amount of coatings employed for each such day.
  - b. An identification of each day during which the VOC emissions from this emissions unit exceeded 21 pounds per day, and the actual VOC emissions for each such day.
  - c. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - d. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - e. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

**D. Reporting Requirements (continued)**

4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners employed in the entire facility. The reports shall include the calculation, 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.1 of these terms and conditions shall be determined in accordance with the following method(s)

a. Emission Limitation:  
20% opacity

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).

b. Emission Limitation:  
0.551 lb/hr of particulate

Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).

c. Emission Limitation:  
2.41 tons/yr of particulate

Applicable Compliance Method: Compliance shall be determined by multiplying the particulate emissions in pounds per hour (determined based upon the method specified in E.1.b of these terms and conditions) times the actual operating hours (hours per year), and dividing by 2000 pounds per ton.

d. Emission Limitation:  
21 lb/day of VOC

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1.

e. Emission Limitation:  
3.83 TPY of VOC

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

2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.

b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.

3. USEPA Method 24 (40 CFR Part 60 Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for

K006 (Manual spray coating operation)  
Manual spray coating operation

### 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.

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>
Manual spray coating booth (with panel filters) used for topcoating truck and truck equipment	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge into the ambient air from any stack associated with this emissions unit visible particulate emissions greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 1.10 pounds per hour.
	OAC Rule 3745-21-09 (U)(2)(d)	See sections B.1 and B.2.
	OAC Rule 3745-31-05 PTI No.13-3235	The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 261 pounds of volatile organic compounds (VOC) per day, 47.62 tons VOC per year, and 4.83 tons particulate per year.
	OAC Rule 3745-35-07	The yearly limit of VOC emissions based on the PTI is less stringent than the limit in A.2.a. See section A.2.a - A.2.d.

### 2. Additional Terms and Conditions

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
  - 3.6 tons per month; and
  - ii. 43.7 tons per year.

**2. Additional Terms and Conditions (continued)**

- 2.b** The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- 0.82 ton per month; and
  - ii 9.9 tons per year.
- 2.c** The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- 2.0 tons per month; and
  - ii 24.5 tons per year.
- 2.d** The total emissions from the entire facility shall not exceed the following limits:
- 47.3 tons per year of VOC;
  - 9.9 tons per year of each individual HAP; and
  - iii 24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

1. This emissions unit shall use only customized topcoats or related customized single coats.
2. The maximum number of motor vehicles and vehicle components processed in this emissions unit shall be less than thirty-five (35) per day.
3. The permittee shall not exceed the following material usage limits for the entire facility:
  - a 21,528 gallons per year of coatings;
  - b 160 gallons per year of masking compounds; and
  - c 936 gallons per year of surface cleaners.
4. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 type of coating(s) (whether customized coats or related customized single coats) used in this emissions unit; and
  - b the number of vehicles and vehicle components coated in this emissions unit.

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

2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons; and
  - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each single HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year;
  - b. the total masking compound usage, in gallons per year; and
  - c. the total surface cleaner usage, in gallons per year.
5. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which a coating other than a customized topcoat or related customized single coat is employed in this emissions unit, and the actual amount of such coating employed for each such day.
  - b. An identification of each day during which the number of motor vehicles and vehicle components processed in this emissions unit exceeded 35 per day, and the actual number of motor vehicles and vehicle components processed for each such day.
  - c. An identification of each day during which the VOC emissions from this emissions unit exceeded 261 pounds per day, and the actual VOC emissions for each such day.
  - d. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - e. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - f. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners used in the entire facility during the previous calendar year. The reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation  
261 lbs/day of VOC  
  
Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.5

**E. Testing Requirements (continued)**

2. 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. Emission Limitation:

3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.

b. Emission Limitation:

47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.

c. Emission Limitation

1.10 lbs/hr of particulate

Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).

3. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K005 (Manual spray coating operation)  
Manual spray coating operation

### 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**

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.

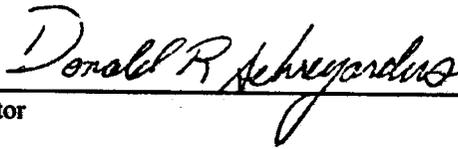
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

A handwritten signature in cursive script, reading "Donald R. Schreyer", is written over 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>
Manual spray Coating booth (with panel filters) used for topcoating truck and truck equipment	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge into the ambient air from any stack associated with this emissions unit visible particulate emissions greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 1.10 pounds per hour.
	OAC Rule 3745-21-09 (U)(2)(d) OAC Rule 3745-31-05 PTI No. 13-3235	See sections B.1 and B.2.  The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 261 pounds of volatile organic compounds (VOC) per day, 47.62 tons VOC per year, and 4.83 tons particulate per year.  The yearly limit of VOC emissions based on the PTI is less stringent than the limit in A.2.a.
	OAC Rule 3745-35-07	See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
  - i. 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
  - i. 0.82 ton per month; and
  - ii. 9.9 tons per year.

**2. Additional Terms and Conditions (continued)**

- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005; K006, K007, K008, K009, and K010 shall not exceed the following limits:
- 2.0 tons per month; and
  - ii. 24.5 tons per year.
- 2.d The total emissions from the entire facility shall not exceed the following limits:
- 47.3 tons per year of VOC;
  - ii. 9.9 tons per year of each individual HAP; and
  - iii. 24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

1. This emissions unit shall use only customized topcoats or related customized single coats.
2. The maximum number of motor vehicles and vehicle components processed in this emissions unit shall be less than thirty-five (35) per day.
3. The permittee shall not exceed the following material usage limits for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
4. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each for this emissions unit:
  - a. the type of coating(s) (whether customized coats or related customized single coats) used in this emissions unit; and
  - b. the number of vehicles and vehicle components coated in this emissions unit.
2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons; and
  - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

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

3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each single HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year;
  - b. the total masking compound usage, in gallons per year; and
  - c. the total facility surface cleaner usage, in gallons per year.
5. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which a coating other than a customized topcoat or related customized single coat is employed in this emissions unit, and the actual amount of such coating employed for each such day.
  - b. An identification of each day during which the number of motor vehicles and vehicle components processed in this emissions unit exceeded 35 per day, and the actual number of motor vehicles and vehicle components processed for each such day.
  - c. An identification of each day during which the VOC emissions from this emissions unit exceeded 261 pounds per day, and the actual VOC emissions for each such day.
  - d. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - e. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - f. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners used in the entire facility during the previous calendar year. The reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation  
261 lbs/day of VOC  
  
Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.5
2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.
  - c. Emission Limitation:  
1.10 lbs/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
3. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

## F. Miscellaneous Requirements

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



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## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K004 (Sanding, grinding and priming operation)  
Sanding, grinding and priming operation

### 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**

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).

#### **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.

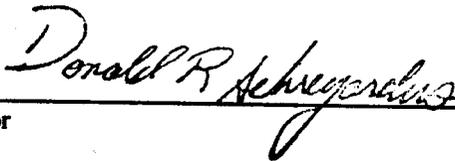
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

A handwritten signature in cursive script, reading "Donald R. Schlegel", is written over 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>
Truck Prep Station	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 0.551 pound per hour.
	OAC Rule 3745-31-05 PTI No. 13-3235	The maximum allowable emission rate for this emissions unit is 21 pounds of volatile organic compounds (VOC) per day, 3.83 tons VOC per year, and 2.41 tons particulate per year.
	OAC Rule 3745-35-07	See section B.2. See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:

- i. 3.6 tons per month; and
- ii. 43.7 tons per year.

The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:

- i. 0.82 ton per month; and
- ii. 9.9 tons per year.

- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:

- i. 2.0 tons per month; and
- ii. 24.5 tons per year.

**2. Additional Terms and Conditions (continued)**

**2.d** The total emissions from the entire facility shall not exceed the following limits:

47.3 tons per year of VOC

9.9 tons per year of any individual HAP; and

iii. 24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

**1** The permittee shall not exceed the following material usage limits for the entire facility:

a. 21,528 gallons per year of coatings;

b. 160 gallons per year of masking compounds; and

c. 936 gallons per year of surface cleaners.

**2.** The permittee shall not employ more than three (3) gallons of coatings per day in this emissions unit.

**3.** The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 employed;

b. the VOC content, in pound per gallon, of each coating and cleanup material, as applied

c. the number of gallons of each coating and cleanup material employed;

d. the total volume, in gallons, of all coatings and cleanup materials employed; and

e. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and

f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

**2.** The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:

a. the name and identification of each coating and cleanup material employed

b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied

c. the individual HAP content of each coating and cleanup material, in pounds per gallon;

d. the combined HAP 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaner employed;

g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;

h. the emissions of each individual 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

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

3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year
  - b. the total masking compound usage, in gallons per year.
  - c. the total surface cleaner usage, in gallons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the total usage of coatings exceeded three (3) gallons per day, and the actual amount of coatings employed for each such day.
  - b. An identification of each day during which the VOC emissions from this emissions unit exceeded 21 pounds per day, and the actual VOC emissions for each such day.
  - c. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - d. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - e. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners employed in the entire facility. The reports shall include the calculations, 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.1 of these terms and conditions shall be determined in accordance with the following method(s)
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation:  
0.551 lb/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
  - c. Emission Limitation:  
2.41 tons/yr of particulate  
  
Applicable Compliance Method: Compliance shall be determined by multiplying the particulate emissions in pounds per hour (determined based upon the method specified in E.1.b of these terms and conditions) times the actual operating hours (hours per year), and dividing by 2000 pounds per ton.
  - d. Emission Limitation:  
21 lb/day of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1.
  - e. Emission Limitation:  
3.83 TPY of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily VOC emission rates for the calendar year.
2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.
3. USEPA Method 24 (40 CFR Part 60 Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

## F. Miscellaneous Requirements

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K003 (Sanding, grinding, and priming operations)  
Sanding, grinding, and priming operations

### 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.

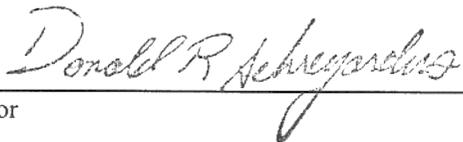
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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**

- 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>
Truck Prep Station	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 0.551 pound per hour.
	OAC Rule 3745-31-05 PTI No. 13-3235	The maximum allowable emission rate for this emissions unit is 21 pounds of volatile organic compounds (VOC) per day, 3.83 tons VOC per year, and 2.41 tons particulate per year.
	OAC Rule 3745-35-07	See section B.2. See section A.2.a - A.2.d.

## 2. Additional Terms and Conditions

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 0.82 ton per month; and
  - ii. 9.9 tons per year.
- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- 2.0 tons per month; and
  - ii. 24.5 tons per year.
- 2.d The total emissions from the entire facility shall not exceed the following limits:
- 47.3 tons per year of VOC;
  - 9.9 tons per year of any individual HAP; and
  - 24.5 tons per year of combined HAPs.

## B. Operational Restrictions

1. The permittee shall not exceed the following material usage limits for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
2. The permittee shall not employ more than three (3) gallons of coatings per day in this emissions unit.
3. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

## 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 employed;
  - b. the VOC content, in pound per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total number of gallons of all coatings employed;
  - e. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

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

2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual 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.
3. The permittee shall collect and record the following information each year for the entire facility
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year
  - b. the total masking compound usage, in gallons per year.
  - c. the total surface cleaner usage, in gallons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the total usage of coatings exceeded three (3) gallons per day and the actual amount of coatings employed for each such day.
  - b. An identification of each day during which the VOC emissions from this emissions unit exceeded 21 pounds per day, and the actual VOC emissions for each such day.
  - c. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - d. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - e. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.

**D. Reporting Requirements (continued)**

3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners employed in the entire facility. The reports shall include the calculations, 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.1 of these terms and conditions shall be determined in accordance with the following method(s)
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation:  
0.551 lb/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
  - c. Emission Limitation:  
2.41 tons/yr of particulate  
  
Applicable Compliance Method: Compliance shall be determined by multiplying the particulate emissions in pounds per hour (determined based upon the method specified in E.1.b of these terms and conditions) times the actual operating hours (hours per year), and dividing by 2000 pounds per ton.
  - d. Emission Limitation:  
21 lb/day of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1.
  - e. Emission Limitation:  
3.83 TPY of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily VOC emission rates for the calendar year.
2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.
3. USEPA Method 24 (40 CFR Part 60 Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.

**E. Testing Requirements (continued)**

4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date 09/17/98

Facility ID: 3-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K002 (4 spray booths w/pane filters for truck topcoating oper)  
4 spray booths w/pane filters for truck topcoating oper

### 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.

#### **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.

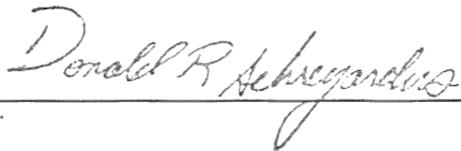
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

**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

A handwritten signature in cursive script, reading "Donald R. Schreyer", is written over 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Manual spray coating booth (with panel filters) used for topcoating truck and truck equipment	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge into the ambient air from any stack associated with this emissions unit visible particulate emissions greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 1.10 pounds per hour.
	OAC Rule 3745-21-09 (U)(2)(d)	See sections B.1 and B.2.
	OAC Rule 3745-31-05 PTI No. 13-3235	The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 261 pounds of volatile organic compounds (VOC) per day, 47.62 tons VOC per year, and 4.83 tons particulate per year.
	OAC Rule 3745-35-07	The yearly limit of VOC emissions based on the PTI is less stringent than the limit in A.2.a. See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- 3.6 tons per month; and
  - 43.7 tons per year.

**2. Additional Terms and Conditions (continued)**

- 2.b** The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 0.82 ton per month; and
  - ii. 9.9 tons per year.
- 2.c** The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- i. 2.0 tons per month; and
  - ii. 24.5 tons per year.
- 2.d** The total emissions from the entire facility shall not exceed the following limits:
- i. 47.3 tons per year of VOC;
  - ii. 9.9 tons per year of any individual HAP; and  
24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

- 1. This emissions unit shall use only customized topcoats or related customized single coats.
- 2. The maximum number of motor vehicles and vehicle components processed in this emissions unit shall be less than thirty-five (35) per day.
- 3. The permittee shall not exceed the following material usage limits for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
- 4. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 type of coating(s) (wether customized coats or related customized single coats) used in this emissions unit; and
  - b. the number of vehicles and vehicle components coated in this emissions unit.

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

2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual 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 cleanup material and coating employed;
  - f. the total gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons; and
  - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons
3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year;
  - b. the total masking compound usage, in gallons per year; and
  - c. The total surface cleaner usage, in gallons per year.
5. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which a coating other than a customized topcoat or related customized single coat is employed in this emissions unit, and the actual amount of such coating employed for each such day.
  - b. An identification of each day during which the number of motor vehicles and vehicle components processed in this emissions unit exceeded 35 per day, and the number of actual motor vehicles and vehicle components processed for each such day.
  - c. An identification of each day during which the VOC emissions from this emissions unit exceeded 261 pounds per day, and the actual VOC emissions for each such day.
  - d. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - e. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - f. An identification of each month during which the combined HAPs emission from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of the combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners used in the entire facility during the previous calendar year. The reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation:  
261 lbs/day of VOC  
  
Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.5

**E. Testing Requirements (continued)**

2. 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. **Emission Limitation:**  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. **Emission Limitation:**  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.
  - c. **Emission Limitation**  
1.10 lbs/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
3. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K008 (Sanding, grinding and priming operation)  
Sanding, grinding and priming operation

### 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**

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).

#### **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.

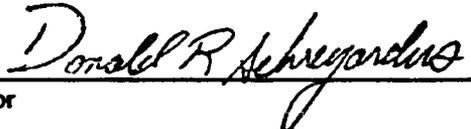
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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
Truck Prep Station	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 0.551 pound per hour.
	OAC Rule 3745-31-05 PTI No. 13-3235	The maximum allowable emission rate for this emissions unit is 21 pounds of volatile organic compounds (VOC) per day, 3.83 tons VOC per year, and 2.41 tons particulate per year.
	OAC Rule 3745-35-07	See section B.2. See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 0.82 ton per month; and
  - ii. 9.9 tons per year.
- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- i. 2.0 tons per month; and
  - ii. 24.5 tons per year.

**2. Additional Terms and Conditions (continued)**

**2.d** The total emissions from the entire facility shall not exceed the following limits:

47.3 tons per year of VOC;

ii. 9.9 tons per year of any individual HAP; and

24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

1. The permittee shall not exceed the following material usage for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
2. The permittee shall not employ more than three (3) gallons of coatings per day in this emissions unit.
3. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 employed;
  - b. the VOC content, in pound per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total number of gallons of all coatings employed;
  - e. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual HAP content of each coating and cleanup material, in pounds per gallon;
  - d. the combination of total HAP 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual 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.

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

3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year.
  - b. the total masking compound usage, in gallons per year.
  - c. the total surface cleaner usage, in gallons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the total usage of coatings exceeded three (3) gallons per day, and the actual amount of coatings employed for each such day.
  - b. An identification of each day during which the VOC emissions from this emissions unit exceeded 21 pounds per day, and the actual VOC emissions for each such day.
  - c. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - d. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - e. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners employed in the entire facility. The reports shall include calculations, 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.1 of these terms and conditions shall be determined in accordance with the following method(s)
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation:  
0.551 lb/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
  - c. Emission Limitation:  
2.41 tons/yr of particulate  
  
Applicable Compliance Method: Compliance shall be determined by multiplying the particulate emissions in pounds per hour (determined based upon the method specified in E.1.b of these terms and conditions) times the actual operating hours (hours per year), and dividing by 2000 pounds per ton.
  - d. Emission Limitation:  
21 lb/day of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1.
  - e. Emission Limitation:  
3.83 TPY of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily VOC emission rates for the calendar year.
2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.
3. USEPA Method 24 (40 CFR Part 60 Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

## F. Miscellaneous Requirements

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K010 (Sanding, grinding and priming operation)  
Sanding, grinding and priming operation

### 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**

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Truck Prep Station	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 0.551 pound per hour.
	OAC Rule 3745-31-05 PTI No. 13-3235	The maximum allowable emission rate for this emissions unit is 21 pounds of volatile organic compounds (VOC) per day, 3.83 tons VOC per year, and 2.41 tons particulate per year.
	OAC Rule 3745-35-07	See section B.2. See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 0.82 ton per month; and
  - ii. 9.9 tons per year.
- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- i. 2.0 tons per month; and
  - ii. 24.5 tons per year.

**2. Additional Terms and Conditions (continued)**

**2.d** The total emissions from the entire facility shall not exceed the following limits:

47.3 tons per year of VOC;

9.9 tons per year of any individual HAP; and

24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

1. The permittee shall not exceed the following material usage for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
2. The permittee shall not employ more than three (3) gallons of coatings in this emissions unit.
3. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 employed;
  - b. the VOC content, in pound per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total number of gallons of all coatings employed;
  - e. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual HAP content of each coating and cleanup material, in pounds per gallon;
  - d. the combined HAP 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual 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

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

3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year.
  - b. the total masking compound usage, in gallons per year.
  - c. the total surface cleaner usage, in gallons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the total usage of coatings exceeded three (3) gallons per day, and the actual amount of coatings employed for each such day.
  - b. An identification of each day during which the VOC emissions from this emissions unit exceeded 21 pounds per day, and the actual VOC emissions for each such day.
  - c. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - d. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - e. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners employed in the entire facility. The reports shall include the calculations, 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.1 of these terms and conditions shall be determined in accordance with the following method(s)

- a. Emission Limitation:  
20% opacity

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).

- b. Emission Limitation  
0.551 lb/hr of particulate

Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).

- c. Emission Limitation:  
2.41 tons/yr of particulate

Applicable Compliance Method: Compliance shall be determined by multiplying the particulate emissions in pounds per hour (determined based upon the method specified in E.1.b of these terms and conditions) times the actual operating hours (hours per year), and dividing by 2000 pounds per ton.

- d. Emission Limitation:  
21 lb/day of VOC

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1.

- e. Emission Limitation:  
3.83 TPY of VOC

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

2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.

- b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.

3. USEPA Method 24 (40 CFR Part 60 Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

## F. Miscellaneous Requirements

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K009 (Sanding, grinding and priming operation)  
Sanding, grinding and priming operation

### 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.

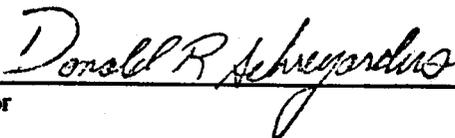
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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>
Truck Prep Station	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 0.551 pound per hour.
	OAC Rule 3745-31-05 PTI No. 13-3235	The maximum allowable emission rate for this emissions unit is 21 pounds of volatile organic compounds (VOC) per day, 3.83 tons VOC per year, and 2.41 tons particulate per year.
	OAC Rule 3745-35-07	See section B.2. See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
  - i. 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
  - i. 0.82 ton per month; and
  - ii. 9.9 tons per year.
- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
  - i. 2.0 tons per month; and
  - ii. 24.5 tons per year.

**2. Additional Terms and Conditions (continued)**

**2.d** The total emissions from the entire facility shall not exceed the following limits:

- 47.3 tons per year of VOC;
- ii. 9.9 tons per year of any individual HAP; and
- iii. 24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

1. The permittee shall not exceed the following material usage for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
2. The permittee shall not employ more than three (3) gallons of coatings per day in this emissions unit.
3. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 employed;
  - b. the VOC content, in pound per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total number of gallons of all coatings employed;
  - e. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information each month for the emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual HAP content of each coating and cleanup material, in pounds per gallon;
  - d. the combination of total HAP 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual 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.

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

3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year.
  - b. the total masking compound usage, in gallons per year
  - c. the total surface cleaner usage, in gallons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the total usage of coatings exceeded three (3) gallons per day and the actual amount of coatings employed for each such day.
  - b. An identification of each day during which the VOC emissions from this emissions unit exceeded 21 pounds per day, and the actual VOC emissions for each such day.
  - c. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - d. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - e. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners employed in the facility. The reports shall include the calculations, 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.1 of these terms and conditions shall be determined in accordance with the following method(s)
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation:  
0.551 lb/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
  - c. Emission Limitation:  
2.41 tons/yr of particulate  
  
Applicable Compliance Method: Compliance shall be determined by multiplying the particulate emissions in pounds per hour (determined based upon the method specified in E.1.b of these terms and conditions) times the actual operating hours (hours per year), and dividing by 2000 pounds per ton.
  - d. Emission Limitation:  
21 lb/day of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1.
  - e. Emission Limitation:  
3.83 TPY of VOC  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.1 and shall be the sum of the daily VOC emission rates for the calendar year.
2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of a combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of each individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Sections C.2 and C.3.
3. USEPA Method 24 (40 CFR Part 60 Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

## F. Miscellaneous Requirements

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit:
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.

## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 13-18-40-8064

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Great Lakes Truck Equipment  
One Acorn Drive  
Oakwood Villag, OH 44146

of a permit to operate for:

K001 (Manual spray coating operation)  
Manual spray coating operation

### **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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Manual spray coating booth (with panel filters) used for topcoating truck and truck equipment	OAC Rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent (60%) opacity, as a six-minute average, at any time.
	OAC Rule 3745-17-11	The permittee shall not cause, allow or permit the discharge of particulates into the ambient air in excess of 1.10 pounds per hour.
	OAC Rule 3745-21-09 (U)(2)(d) OAC Rule 3745-31-05 PTI No. 13-3235	See sections B.1 and B.2.  The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 261 pounds of volatile organic compounds (VOC) per day and 47.62 tons VOC per year, and 4.83 tons particulate per year.
	OAC Rule 3745-35-07	The yearly limit of VOC emissions based on the PTI is less stringent than the limit in A.2.a. See section A.2.a - A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 3.6 tons per month; and
  - ii. 43.7 tons per year.
- 2.b The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined shall not exceed the following limits:
- i. 0.82 ton per month; and
  - ii. 9.9 tons per year.

**2. Additional Terms and Conditions (continued)**

- 2.c The emissions of the combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 shall not exceed the following limits:
- 2.0 tons per month; and
  - ii. 24.5 tons per year.
- 2.d The total emissions from the entire facility shall not exceed the following limits:
- 47.3 tons per year of VOC
  - 9.9 tons per year of any individual HAP; and;
  - iii. 24.5 tons per year of combined HAPs.

**B. Operational Restrictions**

1. This emissions unit shall use only customized topcoats or related customized single coats.
2. The maximum number of motor vehicles and vehicle components processed in this emissions unit shall be less than thirty-five (35) per day.
3. The permittee shall not exceed the following material usage limits for the entire facility:
  - a. 21,528 gallons per year of coatings;
  - b. 160 gallons per year of masking compounds; and
  - c. 936 gallons per year of surface cleaners.
4. The permittee shall operate panel filters in accordance with the manufacturer's specification and inspect the panel filters, at minimum, every week to ensure proper operation.

**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 type of coating(s) (whether customized coats or related customized single coats) used in this emissions unit; and
  - b. the number of vehicles and vehicle components coated in this emissions unit.
2. The permittee shall collect and record the following information each month for emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the individual 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 gallons of coatings, total gallons of masking compounds, and total gallons of surface cleaners employed;
  - g. the VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the emissions of each individual 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.

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

3. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total VOC emissions, in pounds or tons;
  - b. the emissions of each individual HAP, in pounds or tons; and
  - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following information each year for the entire facility:
  - a. the total coating usage, in gallons per year;
  - b. the total masking compound usage, in gallons per year; and
  - c. the total surface cleaner usage, in gallons per year.
5. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emissions from each coating and cleanup material employed, in pounds or tons; and
  - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which a coating other than a customized topcoat or related customized single coat is employed in this emissions unit, and the actual amount of such coating employed for each such day.
  - b. An identification of each day during which the number of motor vehicles and vehicle components processed in this emissions unit exceeded 35 per day, and the actual number of motor vehicles and vehicle components processed for each such day.
  - c. An identification of each day during which the VOC emissions from this emissions unit exceeded 261 pounds per day, and the actual VOC emissions for each such day.
  - d. An identification of each month during which the VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 3.6 tons per month, and the actual VOC emissions for each such month.
  - e. An identification of each month during which the individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 combined exceeded 0.82 ton per month, and the actual emissions of the individual HAP for each such month.
  - f. An identification of each month during which the combined HAPs emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 exceeded 2.0 tons per month, and the actual emissions of combined HAPs for each such month.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC, each individual HAP, and combined HAPs from emissions units of K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 and for the entire facility. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all coatings, all masking compounds, and all surface cleaners used in the entire facility during the previous calendar year. The reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
20% opacity  
  
Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
  - b. Emission Limitation  
261 lbs/day of VOC  
  
Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.5
2. 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. Emission Limitation:  
3.6 tons/month of VOC for emissions units K001 - K010 combined  
0.82 ton/month of each individual HAP for emissions units K001 - K010 combined  
2.0 tons/month of combined HAPs for emissions units K001 - K010 combined  
  
Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping specified in Section C.2.
  - b. Emission Limitation:  
47.3 TPY of VOC for the facility  
9.9 TPY of any individual HAP for the facility  
24.5 TPY of combined HAPs for the facility  
  
Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Sections C.2 and C.3.
  - c. Emission Limitation:  
1.10 lbs/hr of particulate  
  
Applicable Compliance Method: Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(b).
3. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

#### **F. Miscellaneous Requirements**

1. The permittee shall comply with any applicable local, State, and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of this emissions unit.
2. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.