☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **PTI# 13-04378**

A. Source Description

The Enamelac Company (Facility ID 13-18-00-7870) is a speciality coating, engraving, and allied services facility located in Cleveland Ohio. The facility is currently classified as a minor source and has various miscellaneous sources including multiple coating lines, a vapor degreaser, and other insignificant (exempted) emissions units. A PTI application was submitted for a new Emissions Unit, K013 - Global Finishing Solutions Model # FP676; Floor mounted, dry arrestor, paint spray booth with disposable filters and a Craftsman 2.5 gal. pressure tank with a Binks 2001 spray gun for coating miscellaneous metal parts (5.58 ft wide x 6.63 ft high x 6.0 ft working depth).

B. Facility Emissions and Attainment Status

The Enamelac Company falls into the Title V major source category based on the potential facility VOC and HAP emissions (greater than 10.0 tpy individual HAP emissions from the vapor degreaser as derived when using the MACT PTE calculation found in 40 CFR §63.465; and greater than 25.0 tpy combined HAPs when considering all facility emission units); however, the facility has maintained compliance with all applicable standards through a combination of permit conditions (federally enforceable permits: PTI #13-2698, PTI #13-02699, PTI #13-03802, and PTI #13-04100), operational practices (usage restrictions and use of compliant coatings), and verification of facility-wide material usage and emissions through internal monitoring. As a result, the facility-wide emissions for all activities have been well below Title V thresholds (most recent reports indicate that the total OC emissions were 2.824 tpy in CY-2001 and 2.1 tpy for CY-2002); however, the potential to emit for the degreaser alone (as per the MACT standard) is approximately 26 tpy of perchloroethylene, which, would cause this facility to be major for Title V. Consequently, federally enforceable permit restrictions are being proposed to keep facility VOC and HAP emissions below the major source thresholds for Title V. Currently, the permitted limits for all applicable facility sources total roughly 63tpy VOC emissions (not counting the 3 deminimus powder coating spray booths) and the facility is restricted to below 10.0 tpy any single HAP and 25.0tpy for all combined HAPS. Cuyahoga County is designated as non-attainment for ozone.

C. Source Emissions

The company proposes to employ a mixture of work place practices, low VOC materials, SIP approved operational restrictions, material usage restrictions, and other known technologies to demonstrate compliance. Although the theoretical potential for the facility is greater than 100 tpy VOC (based on process capabilities); the proposed emissions unit, with an emissions limitation of 5.11 tpy VOC using the SIP approved 3 gallon per day operational restriction OAC Rule 3745-21-09 (U)(2), should not significantly affect the facilities emissions, nor impact the current compliance status. In addition, permit terms limiting HAP material usage provides federally enforceable conditions to ensure compliance with the HAP thresholds. These restrictions also ensure that a nonattainment NSR and/or PSD review is not required.

D. Conclusion

The compliance options and BAT limits were selected based on information of the emissions unit, process parameters, work practices, material usage restrictions, review of regulatory requirements, and knowledge of the source. Restricting this emissions unit to a 3 gallon per day material usage restriction with the other facility restrictions should keep facility VOC and HAP emissions below the major source thresholds for Title V. Based on the above information, the CLAA recommends that this permit be approved. In the event that the facility exceeds or expects to exceed these limits, the facility must request

Title V status.

State of OhioEPA

Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 13-04378
Fac ID: 1318007870

DATE: 11/30/2004

Enamelac Company (the)
John Kanuch
18103 Roseland Road
Cleveland, OH 44112

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CLAA** **PA**

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04378** FOR AN AIR CONTAMINANT SOURCE FOR
Enamelac Company (the)

On 11/30/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Enamelac Company (the)**, located at **18115 Roseland Road, Cleveland**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04378:

Global Finishing Solutions spray paint booth -- K013.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04378

Application Number:	13-04378
Facility ID:	1318007870
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Enamelac Company (the)
Person to Contact:	John Kanuch
Address:	18103 Roseland Road Cleveland, OH 44112

Location of proposed air contaminant source(s) [emissions unit(s)]:
18115 Roseland Road
Cleveland, Ohio

Description of proposed emissions unit(s):
Global Finishing Solutions spray paint booth -- K013.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	**5.11 tpy**

Emissions Unit ID: **K013**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Global Finishing Solutions - Model # FP676. Floor mounted, dry arrestor, paint spray booth with disposable filters and a Craftsman 2.5 gal. Pressure Tank with a Binks 2001 Spray Gun for coating miscellaneous metal parts. (5.58 ft wide x 6.63 ft high x 6.0 ft working depth).	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 28 pounds per day and 5.11 tons per year, including both coatings and cleanup emissions. See B.4. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-21-09(U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	Volatile organic compound (VOC) emissions from the facility* shall not exceed 99.0 tons per year. See A.2.a., B.1., B.2., and B.3.

2. Additional Terms and Conditions

2.a The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility*

shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.

* The facility emission limits shall include emissions from the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002.

B. Operational Restrictions

1. The maximum annual volatile organic material usage for the facility (emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002) shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. The maximum annual individual HAP material usage for the facility (emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002) shall not exceed 9.9 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

   To ensure enforceability during the first twelve (12) calendar months of operation following the issuance of this permit, the actual individual HAP material usage records over the previous twelve (12) calendar months shall be used to determine the rolling, 12-month individual HAP material usage for the facility.

3. The maximum annual combined HAP material usage for the facility (emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002) shall not exceed 24.9 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

   To ensure enforceability during the first twelve (12) calendar months of operation following the issuance of this permit, the actual combined HAP material usage records over the previous twelve (12) calendar months shall be used to determine the rolling, 12-month combined HAP material usage for the facility.

4. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in 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 of each coating and cleanup material, in pounds per gallon employed;

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

   d. the combined HAPs content of each coating and cleanup material, in pounds per gallon;

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

   f. the daily VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of 1.b x 1.e for each coating and clean-up material, and subtracting any recovered material**);

   ** If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emissions reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.3.

2. The permittee shall collect and record the following information each month for the facility*:

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

   b. the weight, in pounds per month, of each coating and cleanup material employed as applied;

   c. the VOC content of each coating and cleanup material employed, as applied, in percent by weight;

   d. the total volatile organic material usage from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each coating and cleanup material, in pounds per month;

   e. the total VOC emissions generated from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each coating and cleanup material,

and subtracting any recovered material**, in pounds per month;

f. the rolling, 12-month summation of volatile organic material usage from all coating and cleanup materials employed, in tons;

g. the individual HAP and combined HAP content for each coating and cleanup material employed, as applied, in percent by weight;

h. the total individual HAP and combined HAP material usage from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.g)] for each coating and cleanup material, in pounds per month;

i. the total individual HAP and combined HAP emissions generated from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.g)] for each coating and cleanup material, in pounds per month; and

j. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all coating and cleanup materials employed, in tons.

* The facility emission limits shall include emissions from the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002.

** If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emissions reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.3.

3. If a credit for recovered materials is used to demonstrate facility* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered materials and the recovery drum, or tank, serving this emissions unit:

a. the date the materials from the recovery drum or tank were shipped off site;

b. the amount of recovered material, in gallons or pounds, from the recovery drum or tank shipped off site;

c. the average density of the recovered material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);

d. the average VOC content for the recovered material, in percent by weight; and

e. the average VOC emissions from the recovered materials [(3.b.) x (3.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered material is calculated as [(3.b.) x (3.c.) x (3.d.)] if the material amount is recorded in gallons.

* The facility emission limits shall include emissions from the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002.

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

5. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to a generic screening model for common pollutants emitted by this industry using the parameters outlined in the applicability criteria document for the Ohio Coatings General Permit and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene (36.82% by weight of coating VOC content, as applied)
TLV (ug/m3): 434360
Maximum Hourly Emission Rate (lbs/hr): 33.13 (total coating VOC content, as applied)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2151.81
MAGLC (ug/m3): 10341.9

Pollutant: n-Butyl Acetate (26.43% by weight of coating VOC content, as applied)
TLV (ug/m3): 712640
Maximum Hourly Emission Rate (lbs/hr): 33.13 (total coating VOC content, as applied)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1544.60
MAGLC (ug/m3): 16967.62

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

a. changes in the composition of the materials used (coatings or cleanup materials), or the

use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

* Volatile organic compounds (VOC) are defined as photochemically reactive materials (PRM's). Definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC Rule 3745-21-01(C)(5).

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and

shall be sent to the Cleveland DAQ within 30 days after the end of the calender month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation..

2. The permittee shall notify the Cleveland DAQ of any monthly record showing the exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the Cleveland DAQ within 30 days after the end of the calender month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation..

3. The permittee shall submit annual reports to the Cleveland DAQ which summarize the annual emissions of VOC from this emissions unit. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation..

4. The permittee shall submit deviation (excursion) reports which include the following information for the facility* :

   a. an identification of each month during which the rolling, 12-month individual HAP material usage exceeded 9.9 tons/yr based on a rolling, 12-month summation;

   b. an identification of each month during which the rolling, 12-month individual HAP emissions exceeded 9.9 tons/yr based on a rolling, 12-month summation;

   c. an identification of each month during which the rolling, 12-month combined HAP material usage exceeded 24.9 tons/yr based on a rolling, 12-month summation;

   d. an identification of each month during which the rolling, 12-month combined HAP emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;

   e. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons/yr based on a rolling, 12-month summation;

   f. an identification of each month during which the rolling, 12-month VOC emissions exceeded 99.0 tons/yr based on a rolling, 12-month summation;

   The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such

record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

* The facility emission limits shall include emissions from the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002.

5. The permittee shall notify the Cleveland DAQ in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the end of the calender month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation..

E. Testing Requirements

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

a. Emissions Limitation:
28 lbs/day of VOC emissions

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

b. Emissions Limitation:
5.11 tpy of VOC emissions

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

c. Emission Limitation:
99.0 tons VOC per rolling, 12-month period for this facility*

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

d. Emission Limitation:
9.9 tons individual HAP emissions per rolling, 12-month period for this facility*

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

e. Emission Limitation:
24.9 tons combined HAP emissions per rolling, 12-month period for this facility*

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

* The facility emission limits shall include emissions from the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, L001, and L002.

2. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coating and cleanup material. The Cleveland Division of Air Quality (Cleveland DAQ) may require that USEPA Method 24 be used to determine the VOC content of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B.1.-3., C.1.-3., D. and E.