

Synthetic Minor Determination and/or Netting Determination

Permit To Install 13-03985

A. Source Description

American Japanning Inc., a custom paint shop, has submitted a permit to install application to modify all of its existing sources in order to maintain flexibility and meet customer demand.

B. Facility Emissions and Attainment Status

This facility has Title V status due to the PTE of VOC, single HAP and combined HAP emissions in excess of 100, 10 and 25 TPY. Cuyahoga County is designated as attainment for VOC.

C. Source Emissions

The modified sources at this facility have the potential to emit more than 100 tons of VOC per year resulting in Title V applicability. These modified sources also have the potential to emit more than 10 tons of a single HAP and 25 tons of combined HAPs per year resulting in Title V applicability. However, the company has requested a Federal Enforceable Permit to Install (Syn Minor) in order to avoid Title V. The allowable will be 67.2 TPY of VOC, 21.9 TPY of OC, 9.75 TPY of HAPs and 24.25 TPY of combined HAPS.

D. Conclusion

Limiting the emissions of these modified sources (as already designated in the facility's current FESOP) to 67.2 TPY of VOC, 21.9 TPY of OC, 9.75 TPY of HAPs and 24.25 TPY of combined HAPS emissions based on a 12-month rolling summation will not subject American Japanning Inc. to Title V permitting.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-03985**

CERTIFIED MAIL

DATE: 11/26/2002

American Japanning, Incorporated
Dan DeFranco
4917 Van Epps Road
Brooklyn Heights, OH

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** 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.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CBAPC

PA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-03985

Application Number: 13-03985
APS Premise Number: 1318110513
Permit Fee: **To be entered upon final issuance**
Name of Facility: American Japanning, Incorporated
Person to Contact: Dan DeFranco
Address: 4917 Van Epps Road
Brooklyn Heights, OH 44131

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4917 Van Epps Road
Brooklyn Heights, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modifcaiton request for paint booths K001 - K008.

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

Part I - GENERAL TERMS AND CONDITIONS

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 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.)

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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	67.2
OC	21.9
single HAP	9.75
combined HAPs	24.25

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Issued: To be entered upon final issuance

Emissions Unit ID: **K001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Binks spray paint booth, to coat metal parts	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 21.9 lbs/day and 4.0 tons as a rolling, 12-month summation, both including cleanup emissions.
		See Section B.2
		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 use not more than 3 gallons of coatings per day for the coating of metal parts.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See section A.2.a

2. Additional Terms and Conditions

- 2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;
- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

- 2.b** Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule has been revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of USEPA's acceptance in writing; therefore, the 3 gallons per day usage restriction will apply as the exemption level while OAC rule 3745-21-09(U) is being approved by USEPA, as well as after USEPA approval.

B. Operational Restrictions

1. The permittee shall employ no more than 3 gallons of coating in any one day for this emissions unit.
2. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
3. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K001 shall not exceed 4.0 tons, based upon a rolling, 12-month summation of the volatile organic material.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon;
 - c. the single HAP content of each coating and cleanup material, in pounds per gallon;

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Emissions Unit ID: **K001**

- d. the combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. the number of gallons of each coating and cleanup material employed;
 - f. the total number of gallons of all coatings employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of b x e);
 - h. the emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons (sum of c x e); and
 - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons (sum of d x e or the sum of all HAPs from each coating and cleanup material applied, from h above).
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
- a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);
 - b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. 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.

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Emissions Unit ID: **K001**

4. The permit to install for this emissions unit K001 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4476

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.).

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Emissions Unit ID: **K001**

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5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) or regulating agency in writing of any daily record showing that the coating line employs 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 CDAQ or regulating agency within 45 days after the exceedance occurs.
2. The permittee shall notify the CDAQ or regulating agency of any daily record showing the exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the CDAQ or regulating agency within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC, OC, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.
4. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating

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agency within 30 days after the event occurs.

E. Testing Requirements

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

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Emissions Unit ID: **K001**

- a. Emissions Limitation:
21.9 lbs/day of VOC emissions

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emissions Limitation:
4.0 TPY of VOC emissions

Applicable Compliance Method:
Compliance shall be 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:

67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - d. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - e. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and any

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cleanup materials.

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

F. Miscellaneous Requirements

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

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Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K002 - Paint spray booth	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V
when coating non-metal materials not subject to OAC rule 3745-21-09(U)(1)(d)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(U)(1)(d)
	OAC rule 3745-21-07(G)(2)
when coating miscellaneous metal parts and materials	OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: **K002**

Applicable Emissions
Limitations/Control Measures

See section A.2.a

Organic compound (OC) emissions shall not exceed 7.3 tons, including cleanup emissions from coating non-metal parts and materials, as a rolling, 12-month summation.

See section B.1

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(G)(2).

Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day from all coatings and photochemically reactive cleanup materials, on any day when photochemically reactive materials are employed.

Volatile organic compounds (VOC) emissions shall not exceed 21.0 lbs/hr and 13.2 tons as a rolling, 12-month summation, including cleanup emissions from coating metal parts.

See section B.1

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-

21-09(U)(1)(d).

The VOC content of any coating employed shall not exceed 3.5 pounds of VOC per gallon, excluding water and exempt solvents, and see Section B.3 below.

2. Additional Terms and Conditions

2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;
- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

B. Operational Restrictions

1. The permittee shall operate the filtration system for control of particulate emissions whenever this emissions unit is in operation.
2. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K002 shall not exceed 13.2 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

3. Coating applied in this emissions unit shall not be dried at temperatures exceeding 200 degrees Fahrenheit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. for each coating and cleanup material to be applied to or used in the cleanup of and/or coating of non-metal parts/materials, a statement as to if each material is photochemically reactive (PRM*) or non-photochemically reactive (non-PRM), (documentation must be maintained on file);
 - c. the VOC content of each coating applied to metal parts, in pounds per gallon;

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- d. the VOC content* of each coating applied to metal parts, in pounds per gallon less water and exempt solvents;
- e. the OC content* of each coating applied to non-metal parts/materials, in pounds per gallon;
- f. the OC and/or VOC content* of each cleanup material, in pounds per gallon;
- g. when coating non-metal parts/materials and using a PRM, the number of gallons of each coating and each PRM cleanup material applied in the emissions unit;
- h. the number of gallons of each coating and each cleanup material applied to/for non-metal parts/materials;
- i. the number of gallons of each coating and each cleanup material applied to/for metal parts/materials;
- j. on any day when applying a PRM coating or cleanup material to/for non-metal parts/materials, the total OC emissions from all coatings and PRM cleanup materials applied (sum of the products for all applicable materials, for coatings {e x g}, for cleanup {f x g}), in pounds per day;
- k. the total hours of operation of this emissions unit;
- l. the total hours of operation in the coating and cleanup of non-metal parts and materials;
- m. the total hours of operation in the coating and cleanup of metal parts and materials;
- n. on any day when applying a PRM coating or cleanup material to non-metal parts/materials, the average hourly CO emissions from all coatings and PRM cleanup materials (j / k), in pounds per hour;

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- o. the total OC emissions from all coatings and cleanup materials applied to/for non-metal parts/materials (sum of products of all applicable materials {e x h}), in pounds per day;
- p. the total OC emissions from all coatings and cleanup materials applied to/for metal parts/materials (sum of products of all applicable materials {c x i}), in pounds per day;
- q. the average hourly VOC emissions from all coating and cleanup applied to/for metal parts (p / m), in pounds per hour;
- r. the individual HAP content of each coating and cleanup material, in pounds of each HAP per gallon;
- s. the total HAPs content of each coating and cleanup material, in pound per gallon;
- t. the emissions of each HAP from all coating and cleanup material applied (sum of the products for each material, {r x h} and {r x i}), in pounds per day;
- u. the emissions of the combined HAPs from all coatings and cleanup materials employed (sum of all HAP emissions from {t} above; or the sum of the products of each material {s x h} and {s x i}), in pounds per day;
- v. the rolling 12-month OC emissions from the coating and cleanup of non-metal parts and materials; and
- w. the rolling 12-month VOC emissions from the coating and cleanup of metal parts and materials.

* VOC, OC (definition as: organic material), and PRM shall include all materials and shall be defined as found in OAC 3745-21-01

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
 - a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);

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- b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;

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- c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. The permittee shall maintain daily records that document any time periods when the filtration system was not in service when the emissions unit was in operation.
 4. The permit to install for this emissions unit K002 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1862

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1862

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1862

MAGLC (ug/m3): 10,333

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Emissions Unit ID: **K002**

Pollutant: Toluene

TLV (ug/m3): 188,000

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Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1862

MAGLC (ug/m3): 4476

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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
6. 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.
7. The permittee shall maintain a record of any period of time in which a coating, applied in this emissions unit, is dried at temperatures exceeding 200 degrees Fahrenheit.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) of any daily record showing the exceedance of the hourly VOC emission limitation for this emissions unit when coating metal parts. A copy of such record shall be sent to the CDAQ within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC emissions from coating and cleanup of metal parts/materials, OC emissions from coating and cleanup of non-metal, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ or regulating agency which include the following information:
 - a. for the days during which a photochemically reactive material was employed to/for non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed to/for non-metal, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall notify the Ohio EPA, CDAQ or regulating agency, in writing, of any monthly record showing the use of non-complying coatings, greater than 3.5 pounds of VOC per gallon. The notification shall include a copy of such record and shall be sent to the CDAQ or regulating agency within 30 days following the end of the calendar month.
5. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.
6. The permittee shall submit quarterly deviation reports for any record of any period of time in

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which a coating(s), applied in this emissions unit, was/were dried at temperatures exceeding 200 degrees Fahrenheit.

Quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

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E. Testing Requirements

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

a. Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents when coating metal parts

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

b. Emission Limitation:
8 pounds/hour and 40 pounds/day of OC emissions when coating non-metal parts

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

c. Emission Limitation:
7.3 TPY of OC emissions when coating non-metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 and shall be the sum of the daily OC emissions due to the coating of non-metal parts.

d. Emission Limitation:
21.0 lbs/hr of VOC emissions when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 for the coating of metal parts

e. Emission Limitation:
13.2 TPY of VOC emissions when coating metal parts

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

f. Emission Limitation:

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67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

- g. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

- h. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

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

F. Miscellaneous Requirements

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Binks spray paint booth, to coat metal parts	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 21.9 lbs/day and 4.0 tons as a rolling, 12-month summation, both including cleanup emissions.
		See Section B.2
		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 use not more than 3 gallons of coatings per day for the coating of metal parts.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See section A.2.a

2. Additional Terms and Conditions

- 2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;
- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

- 2.b** Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule has been revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of USEPA's acceptance in writing; therefore, the 3 gallons per day usage restriction will apply as the exemption level while OAC rule 3745-21-09(U) is being approved by USEPA, as well as after USEPA approval.

B. Operational Restrictions

1. The permittee shall employ no more than 3 gallons of coating in any one day for this emissions unit.
2. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
3. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K003 shall not exceed 4.0 tons, based upon a rolling, 12-month summation of the volatile organic material.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon;
 - c. the single HAP content of each coating and cleanup material, in pounds per gallon;

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- d. the combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. the number of gallons of each coating and cleanup material employed;
 - f. the total number of gallons of all coatings employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of b x e);
 - h. the emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons (sum of c x e); and
 - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons (sum of d x e or the sum of all HAPs from each coating and cleanup material applied, from h above).
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
- a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);
 - b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. 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.

4. The permit to install for this emissions unit K003 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4476

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

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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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) or regulating agency in writing of any daily record showing that the coating line employs 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 CDAQ or regulating agency within 45 days after the exceedance occurs.
2. The permittee shall notify the CDAQ or regulating agency of any daily record showing the exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the CDAQ or regulating agency within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC, OC, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar

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year.

4. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.

E. Testing Requirements

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

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- a. Emissions Limitation:
21.9 lbs/day of VOC emissions

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emissions Limitation:
4.0 TPY of VOC emissions

Applicable Compliance Method:
Compliance shall be 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:
67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - d. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - e. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and any cleanup materials.

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

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F. Miscellaneous Requirements

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Binks paint spray booth, to coat metal parts	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 21.9 lbs/day and 4.0 tons as a rolling, 12-month summation, both including cleanup emissions.
		See Section B.2
		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 use not more than 3 gallons of coatings per day for the coating of metal parts.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See section A.2.a

2. Additional Terms and Conditions

- 2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:
 - i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;
 - ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and

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iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

2.b Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule has been revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of USEPA's acceptance in writing; therefore, the 3 gallons per day usage restriction will apply as the exemption level while OAC rule 3745-21-09(U) is being approved by USEPA, as well as after USEPA approval.

B. Operational Restrictions

1. The permittee shall employ no more than 3 gallons of coating in any one day for this emissions unit.
2. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
3. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K004 shall not exceed 4.0 tons, based upon a rolling, 12-month summation of the volatile organic material.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon;
 - c. the single HAP content of each coating and cleanup material, in pounds per gallon;

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- d. the combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. the number of gallons of each coating and cleanup material employed;
 - f. the total number of gallons of all coatings employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of b x e);
 - h. the emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons (sum of c x e); and
 - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons (sum of d x e or the sum of all HAPs from each coating and cleanup material applied, from h above).
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
- a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);
 - b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. 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.

4. The permit to install for this emissions unit K004 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4476

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

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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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) or regulating agency in writing of any daily record showing that the coating line employs 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 CDAQ or regulating agency within 45 days after the exceedance occurs.
2. The permittee shall notify the CDAQ or regulating agency of any daily record showing the exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the CDAQ or regulating agency within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC, OC, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar

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year.

4. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.

E. Testing Requirements

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

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- a. Emissions Limitation:
21.9 lbs/day of VOC emissions

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emissions Limitation:
4.0 TPY of VOC emissions

Applicable Compliance Method:
Compliance shall be 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:
67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - d. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - e. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and any

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cleanup materials.

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

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F. Miscellaneous Requirements

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

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Emissions Unit ID: **K005**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K005 - Paint spray booth	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V
when coating non-metal materials not subject to OAC rule 3745-21-09(U)(1)(d)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(U)(1)(d)
	OAC rule 3745-21-07(G)(2)
when coating miscellaneous metal parts and materials	OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: **K005**

Applicable Emissions
Limitations/Control Measures

See section A.2.a

Organic compound (OC) emissions shall not exceed 7.3 tons, including cleanup emissions from coating non-metal parts and materials, as a rolling, 12-month summation.

See section B.1

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(G)(2).

Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day from all coatings and photochemically reactive cleanup materials, on any day when photochemically reactive materials are employed.

Volatile organic compounds (VOC) emissions shall not exceed 21.0 lbs/hr and 17.0 tons as a rolling, 12-month summation, including cleanup emissions from coating metal parts.

See section B.1

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-

21-09(U)(1)(d).

The VOC content of any coating employed shall not exceed 3.5 pounds of VOC per gallon, excluding water and exempt solvents, and see Section B.3 below.

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2. Additional Terms and Conditions

2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;
- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

B. Operational Restrictions

1. The permittee shall operate the filtration system for control of particulate emissions whenever this emissions unit is in operation.
2. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K005 shall not exceed 17.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

3. Coating applied in this emissions unit shall not be dried at temperatures exceeding 200 degrees Fahrenheit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. for each coating and cleanup material to be applied to or used in the cleanup of and/or

Emissions Unit ID: **K005**

coating of non-metal parts/materials, a statement as to if each material is photochemically reactive (PRM*) or non-photochemically reactive (non-PRM), (documentation must be maintained on file);

- c. the VOC content of each coating applied to metal parts, in pounds per gallon;
- d. the VOC content* of each coating applied to metal parts, in pounds per gallon less water and exempt solvents;
- e. the OC content* of each coating applied to non-metal parts/materials, in pounds per gallon;
- f. the OC and/or VOC content* of each cleanup material, in pounds per gallon;
- g. when coating non-metal parts/materials and using a PRM, the number of gallons of each coating and each PRM cleanup material applied in the emissions unit;
- h. the number of gallons of each coating and each cleanup material applied to/for non-metal parts/materials;
- i. the number of gallons of each coating and each cleanup material applied to/for metal parts/materials;
- j. on any day when applying a PRM coating or cleanup material to/for non-metal parts/materials, the total OC emissions from all coatings and PRM cleanup materials applied (sum of the products for all applicable materials, for coatings {e x g}, for cleanup {f x g}), in pounds per day;
- k. the total hours of operation of this emissions unit;
- l. the total hours of operation in the coating and cleanup of non-metal parts and materials;
- m. the total hours of operation in the coating and cleanup of metal parts and materials;
- n. on any day when applying a PRM coating or cleanup material to non-metal parts/materials, the average hourly CO emissions from all coatings and PRM cleanup materials (j / k), in pounds per hour;

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- o. the total OC emissions from all coatings and cleanup materials applied to/for non-metal parts/materials (sum of products of all applicable materials {e x h}), in pounds per day;
- p. the total OC emissions from all coatings and cleanup materials applied to/for metal parts/materials (sum of products of all applicable materials {c x i}), in pounds per day;
- q. the average hourly VOC emissions from all coating and cleanup applied to/for metal parts (p / m), in pounds per hour;
- r. the individual HAP content of each coating and cleanup material, in pounds of each HAP per gallon;
- s. the total HAPs content of each coating and cleanup material, in pound per gallon;
- t. the emissions of each HAP from all coating and cleanup material applied (sum of the products for each material, {r x h} and {r x i}), in pounds per day;
- u. the emissions of the combined HAPs from all coatings and cleanup materials employed (sum of all HAP emissions from {t} above; or the sum of the products of each material {s x h} and {s x i}), in pounds per day;
- v. the rolling 12-month OC emissions from the coating and cleanup of non-metal parts and materials; and
- w. the rolling 12-month VOC emissions from the coating and cleanup of metal parts and materials.

* VOC, OC (definition as: organic material), and PRM shall include all materials and shall be defined as found in OAC 3745-21-01

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
 - a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);

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- b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;

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- c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. The permittee shall maintain daily records that document any time periods when the filtration system was not in service when the emissions unit was in operation.
 4. The permit to install for this emissions unit K005 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 10,333

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Pollutant: Toluene
TLV (ug/m3): 188,000

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Emissions Unit ID: **K005**

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Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 4476

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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
6. 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.
7. The permittee shall maintain a record of any period of time in which a coating, applied in this emissions unit, is dried at temperatures exceeding 200 degrees Fahrenheit.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) of any daily record showing the exceedance of the hourly VOC emission limitation for this emissions unit when coating metal parts. A copy of such record shall be sent to the CDAQ within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC emissions from coating and cleanup of metal parts/materials, OC emissions from coating and cleanup of non-metal, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ or regulating agency which include the following information:
 - a. for the days during which a photochemically reactive material was employed to/for non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed to/for non-metal, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall notify the Ohio EPA, CDAQ or regulating agency, in writing, of any monthly record showing the use of non-complying coatings, greater than 3.5 pounds of VOC per gallon. The notification shall include a copy of such record and shall be sent to the CDAQ or regulating agency within 30 days following the end of the calendar month.
5. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.
6. The permittee shall submit quarterly deviation reports for any record of any period of time in

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which a coating(s), applied in this emissions unit, was/were dried at temperatures exceeding 200 degrees Fahrenheit.

Quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

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Emissions Unit ID: **K005**

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.2 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emission Limitation:
8 pounds/hour and 40 pounds/day of OC emissions when coating non-metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - c. Emission Limitation:
7.3 TPY of OC emissions when coating non-metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 and shall be the sum of the daily OC emissions due to the coating of non-metal parts.
 - d. Emission Limitation:
21.0 lbs/hr of VOC emissions when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 for the coating of metal parts
 - e. Emission Limitation:
17.0 TPY of VOC emissions when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year due to coating metal parts.
 - f. Emission Limitation:

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67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

- g. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

- h. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

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

F. Miscellaneous Requirements

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

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Emissions Unit ID: **K006**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K006 - paint spray booth	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V
when coating non-metal materials not subject to OAC rule 3745-21-09(U)(1)(d)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(U)(1)(d)
	OAC rule 3745-21-07(G)(2)
when coating miscellaneous metal parts and materials	OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: **K006**

Applicable Emissions
Limitations/Control Measures

See section A.2.a

Organic compound (OC) emissions shall not exceed 7.3 tons, including cleanup emissions from coating non-metal parts and materials, as a rolling, 12-month summation.

See section B.1

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(G)(2).

Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day from all coatings and photochemically reactive cleanup materials, on any day when photochemically reactive materials are employed.

Volatile organic compounds (VOC) emissions shall not exceed 21.0 lbs/hr and 17.0 tons as a rolling, 12-month summation, including cleanup emissions from coating metal parts.

See section B.1

The requirements established pursuant to this rule also include the requirements of OAC rule 3745-

21-09(U)(1)(d).

The VOC content of any coating employed shall not exceed 3.5 pounds of VOC per gallon, excluding water and exempt solvents, and see Section B.3 below.

2. Additional Terms and Conditions

2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;
- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

B. Operational Restrictions

1. The permittee shall operate the filtration system for control of particulate emissions whenever this emissions unit is in operation.
2. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K006 shall not exceed 17.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

3. Coating applied in this emissions unit shall not be dried at temperatures exceeding 200 degrees Fahrenheit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. for each coating and cleanup material to be applied to or used in the cleanup of and/or coating of non-metal parts/materials, a statement as to if each material is photochemically reactive (PRM*) or non-photochemically reactive (non-PRM), (documentation must be maintained on file);
 - c. the VOC content of each coating applied to metal parts, in pounds per gallon;

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- d. the VOC content* of each coating applied to metal parts, in pounds per gallon less water and exempt solvents;
- e. the OC content* of each coating applied to non-metal parts/materials, in pounds per gallon;
- f. the OC and/or VOC content* of each cleanup material, in pounds per gallon;
- g. when coating non-metal parts/materials and using a PRM, the number of gallons of each coating and each PRM cleanup material applied in the emissions unit;
- h. the number of gallons of each coating and each cleanup material applied to/for non-metal parts/materials;
- i. the number of gallons of each coating and each cleanup material applied to/for metal parts/materials;
- j. on any day when applying a PRM coating or cleanup material to/for non-metal parts/materials, the total OC emissions from all coatings and PRM cleanup materials applied (sum of the products for all applicable materials, for coatings {e x g}, for cleanup {f x g}), in pounds per day;
- k. the total hours of operation of this emissions unit;
- l. the total hours of operation in the coating and cleanup of non-metal parts and materials;
- m. the total hours of operation in the coating and cleanup of metal parts and materials;
- n. on any day when applying a PRM coating or cleanup material to non-metal parts/materials, the average hourly CO emissions from all coatings and PRM cleanup materials (j / k), in pounds per hour;

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- o. the total OC emissions from all coatings and cleanup materials applied to/for non-metal parts/materials (sum of products of all applicable materials {e x h}), in pounds per day;
- p. the total OC emissions from all coatings and cleanup materials applied to/for metal parts/materials (sum of products of all applicable materials {c x i}), in pounds per day;
- q. the average hourly VOC emissions from all coating and cleanup applied to/for metal parts (p / m), in pounds per hour;
- r. the individual HAP content of each coating and cleanup material, in pounds of each HAP per gallon;
- s. the total HAPs content of each coating and cleanup material, in pound per gallon;
- t. the emissions of each HAP from all coating and cleanup material applied (sum of the products for each material, {r x h} and {r x i}), in pounds per day;
- u. the emissions of the combined HAPs from all coatings and cleanup materials employed (sum of all HAP emissions from {t} above; or the sum of the products of each material {s x h} and {s x i}), in pounds per day;
- v. the rolling 12-month OC emissions from the coating and cleanup of non-metal parts and materials; and
- w. the rolling 12-month VOC emissions from the coating and cleanup of metal parts and materials.

* VOC, OC (definition as: organic material), and PRM shall include all materials and shall be defined as found in OAC 3745-21-01

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
 - a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);

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- b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;

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- c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. The permittee shall maintain daily records that document any time periods when the filtration system was not in service when the emissions unit was in operation.
 4. The permit to install for this emissions unit K006 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 10,333

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Emissions Unit ID: **K006**

Pollutant: Toluene

TLV (ug/m3): 188,000

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Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2483

MAGLC (ug/m3): 4476

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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
6. 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.
7. The permittee shall maintain a record of any period of time in which a coating, applied in this emissions unit, is dried at temperatures exceeding 200 degrees Fahrenheit.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) of any daily record showing the exceedance of the hourly VOC emission limitation for this emissions unit when coating metal parts. A copy of such record shall be sent to the CDAQ within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC emissions from coating and cleanup of metal parts/materials, OC emissions from coating and cleanup of non-metal, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ or regulating agency which include the following information:
 - a. for the days during which a photochemically reactive material was employed to/for non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed to/for non-metal, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall notify the Ohio EPA, CDAQ or regulating agency, in writing, of any monthly record showing the use of non-complying coatings, greater than 3.5 pounds of VOC per gallon. The notification shall include a copy of such record and shall be sent to the CDAQ or regulating agency within 30 days following the end of the calendar month.
5. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.
6. The permittee shall submit quarterly deviation reports for any record of any period of time in

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which a coating(s), applied in this emissions unit, was/were dried at temperatures exceeding 200 degrees Fahrenheit.

Quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.2 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emission Limitation:
8 pounds/hour and 40 pounds/day of OC emissions when coating non-metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - c. Emission Limitation:
7.3 TPY of OC emissions when coating non-metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 and shall be the sum of the daily OC emissions due to the coating of non-metal parts.
 - d. Emission Limitation:
21.0 lbs/hr of VOC emissions when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 for the coating of metal parts
 - e. Emission Limitation:
17.0 TPY of VOC emissions when coating metal parts

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1 and shall be the sum of the daily emission rates for the calendar year due to coating metal parts
 - f. Emission Limitation:
67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

- g. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

- h. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.

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

F. Miscellaneous Requirements

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

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Emissions Unit ID: **K007**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K007 - Binks spray booth, to coat metal parts	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 21.9 lbs/day and 4.0 tons as a rolling, 12-month summation, both including cleanup emissions.
		See Section B.2
		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 use not more than 3 gallons of coatings per day for the coating of metal parts.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See section A.2.a

2. Additional Terms and Conditions

- 2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

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- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;

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- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

- 2.b** Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule has been revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of USEPA's acceptance in writing; therefore, the 3 gallons per day usage restriction will apply as the exemption level while OAC rule 3745-21-09(U) is being approved by USEPA, as well as after USEPA approval.

B. Operational Restrictions

- 1. The permittee shall employ no more than 3 gallons of coating in any one day for this emissions unit.
- 2. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
- 3. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K007 shall not exceed 4.0 tons, based upon a rolling, 12-month summation of the volatile organic material.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

C. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon;

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- c. the single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. the combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. the number of gallons of each coating and cleanup material employed;
 - f. the total number of gallons of all coatings employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of b x e);
 - h. the emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons (sum of c x e); and
 - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons (sum of d x e or the sum of all HAPs from each coating and cleanup material applied, from h above).
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
- a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);
 - b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. 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.

4. The permit to install for this emissions unit K007 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4476

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

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- 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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) or regulating agency in writing of any daily record showing that the coating line employs 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 CDAQ or regulating agency within 45 days after the exceedance occurs.
2. The permittee shall notify the CDAQ or regulating agency of any daily record showing the

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exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the CDAQ or regulating agency within 45 days after the exceedance occurs.

3. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC, OC, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.
4. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.

E. Testing Requirements

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

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- a. Emissions Limitation:
21.9 lbs/day of VOC emissions

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emissions Limitation:
4.0 TPY of VOC emissions

Applicable Compliance Method:
Compliance shall be 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:
67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - d. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - e. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and any

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cleanup materials.

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

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F. Miscellaneous Requirements

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K008 - paint spray/dip booth, to coat metal parts	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 21.9 lbs/day and 4.0 tons as a rolling, 12-month summation, both including cleanup emissions.
		See Section B.2
		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 use not more than 3 gallons of coatings per day for the coating of metal parts.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See section A.2.a

2. Additional Terms and Conditions

- 2.a The facility-wide combined VOC, OC, and HAP emissions from all materials applied in emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together shall not exceed the following limits:

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- i. 67.2 tons of VOC from coating miscellaneous metal parts and materials; and 21.9 tons of OC from coating non-metal parts and materials, each as a rolling, 12-month summation;

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- ii. 9.75 tons of each single HAP, as a rolling, 12-month summation; and
- iii. 24.25 tons of all HAPs combined, as a rolling, 12-month summation.

The permittee shall comply with the above restrictions upon startup, based upon operating records from the previous 12-month period.

- 2.b** Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule has been revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of USEPA's acceptance in writing; therefore, the 3 gallons per day usage restriction will apply as the exemption level while OAC rule 3745-21-09(U) is being approved by USEPA, as well as after USEPA approval.

B. Operational Restrictions

1. The permittee shall employ no more than 3 gallons of coating in any one day for this emissions unit.
2. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
3. The maximum annual volatile organic material usage* (from coatings and clean up materials) for K008 shall not exceed 4.0 tons, based upon a rolling, 12-month summation of the volatile organic material.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon;

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- c. the single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. the combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. the number of gallons of each coating and cleanup material employed;
 - f. the total number of gallons of all coatings employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of b x e);
 - h. the emissions of each single HAP from all coatings and cleanup materials employed, in pounds or tons (sum of c x e); and
 - i. the emissions of combined HAPs from all coatings and cleanup materials employed, in pounds or tons (sum of d x e or the sum of all HAPs from each coating and cleanup material applied, from h above).
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 together:
- a. the total VOC emissions from coating and cleanup of miscellaneous metal parts/materials, and the total OC emissions from coating and cleanup of all other materials (non-metals), in pounds or tons (sum of daily emissions for each month);
 - b. the rolling, 12-month VOC emissions from coating and clean-up of miscellaneous metal parts/materials; and the rolling, 12 month OC emissions from coating and cleanup of non-metals;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month);
 - d. the rolling, 12-month emissions of each individual HAP;
 - e. the total HAP emissions from all coatings and cleanup materials employed, in pounds or tons (sum of daily emissions for each month); and
 - f. the total rolling, 12-month emissions of all HAPs.
3. 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.

4. The permit to install for this emissions unit K008 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 14,048

Pollutant: MIBK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4881

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620.6

MAGLC (ug/m3): 4476

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

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- 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.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) or regulating agency in writing of any daily record showing that the coating line employs 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 CDAQ or regulating agency within 45 days after the exceedance occurs.
2. The permittee shall notify the CDAQ or regulating agency of any daily record showing the

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exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the CDAQ or regulating agency within 45 days after the exceedance occurs.

3. The permittee shall also submit annual reports to the CDAQ or regulating agency which summarize the emissions of VOC, OC, each single HAP, and combined HAPs from this emissions unit and emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year.
4. The permittee shall notify the CDAQ or regulating agency 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 CDAQ or regulating agency within 30 days after the event occurs.

E. Testing Requirements

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

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- a. Emissions Limitation:
21.9 lbs/day of VOC emissions

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emissions Limitation:
4.0 TPY of VOC emissions

Applicable Compliance Method:
Compliance shall be 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:
67.2 tons/yr of VOC from coating miscellaneous metal parts and 21.9 tons/yr of OC from coating other materials (non-metal parts) for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - d. Emission Limitation:
9.75 tons/yr of each single HAP for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
 - e. Emission Limitation:
24.25 tons/yr of combined HAPs for emissions units K001, K002, K003, K004, K005, K006, K007, and K008 combined, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2 and shall be the sum of the monthly emission rates for any rolling, 12-month period.
2. U.S. EPA method 24 shall be used to determine the VOC contents of the coatings and any

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cleanup materials.

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

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F. Miscellaneous Requirements

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