

Facility ID: 0812760577 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit K002](#)

[Go to Part II for Emissions Unit P001](#)

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Facility ID: 0812760577 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Jupiter paint spray booth (G30) (See Section A.2.c)	OAC rule 3745-31-05(A)(3) PTI 08-04477	Volatile Organic Compounds (VOC) emissions shall not exceed the following: 1.75 pounds per hour and 3.22 tons per year (TPY).
	OAC rule 3745-21-09(U)(1)	The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B). This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09 (U)(2)(c).
	OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V permitting requirements	See Section A.2.b.

2. Additional Terms and Conditions

- (a) The 1.75 pounds of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
The emissions of Hazardous Air Pollutants (HAPs), as identified in section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit to determine annual VOC emissions:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The VOC content of each coating, as applied, in pounds per gallon.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The number of gallons of each cleanup material drummed for shipment off-site.
 - g. The VOC content of each cleanup material, in pounds per gallon.
 - h. The total VOC emissions from all coatings and cleanup materials employed, in lbs/month, (i.e., the summation

- of the products of C.1.b X C.1.c for each coating material plus the sum of the products of [(C.1.e - C.1.f) X C.1.g] for each cleanup material).
2. The permittee shall collect and record the following information each month for emissions units K001, K002 and P001:
 - a. The name and identification of each coating material employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).
 - d. The number of gallons of each coating material employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
 - h. The number of gallons of each cleanup material employed.
 - i. The number of gallons of each cleanup material drummed for shipment off-site.
 - j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b X C.2.d for each coating material plus the sum of the products of [C.2.f X (C.2.h - C.2.i)] for each cleanup material).
 - k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c X C.2.d for each coating material plus the sum of the products of [C.2.g X (C.2.h - C.2.i)] for each cleanup material).
 - l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAPs for all of the HAPs employed at this facility.
 - m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

* A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.
 3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001, K002 and P001 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 approval 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 summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Xylene

TLV(mg/m3): 60.6

Maximum Hourly Emission Rate (lbs/hr): 16.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 561.28

MAGLC(ug/m3): 1,444

Physical changes to or changes in the method of operation of the emissions unit after its installation of 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 (typically for coatings or cleanup materials), or the use of the 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.).

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.

4. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

Emission Limitation-
1.75 pounds of VOC per hour, excluding cleanup

Applicable Compliance Method-
Compliance shall be based upon the maximum hourly coating usage rate multiplied by the maximum VOC content.

Emission Limitation-
3.22 TPY VOC, including cleanup materials

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit and shall be the summation of the 12 monthly VOC emission rates divided by 2000 lbs/ton.

Emission Limitations-
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Sections C.2. of this permit.

Emission Limitations-
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Sections C.2. of this permit.

F. Miscellaneous Requirements

1. The terms and conditions from Section A.2.b., Section C.2., and Section D.1. are federally enforceable.

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Facility ID: 0812760577 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.

- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Atlantic paint spray booth	OAC rule 3745-31-05(A)(3) PTI 08-04477	Volatile Organic Compounds (VOC) emissions shall not exceed the following: 1.75 pounds per hour and 3.22 tons per year (TPY). The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09 (U)(2)(c).
	OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V permitting requirements	See Section A.2.b.

2. Additional Terms and Conditions

- (a) The 1.75 pounds of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
The emissions of Hazardous Air Pollutants (HAPs), as identified in section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for this emission unit to determine annual VOC emissions:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The VOC content of each coating, as applied, in pounds per gallon.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The number of gallons of each cleanup material drummed for shipment off-site.
 - g. The VOC content of each cleanup material, in pounds per gallon.
 - h. The total VOC emissions from all coatings and cleanup materials employed, in lbs/month, (i.e., the summation of the products of C.1.b X C.1.c for each coating material plus the sum of the products of [(C.1.e - C.1.f) X C.1.g] for each cleanup material).
- 2. The permittee shall collect and record the following information each month for emissions units K001, K002 and P001:
 - a. The name and identification of each coating material employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied..
 - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).
 - d. The number of gallons of each coating material employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents form C.2.f).
 - h. The number of gallons of each cleanup material employed.

- i. The number of gallons of each cleanup material drummed for shipment off-site.
 - j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b X C.2.d for each coating material plus the sum of the products of [C.2.f X (C.2.h - C.2.i)] for each cleanup material).
 - k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c X C.2.d for each coating material plus the sum of the products of [C.2.g X (C.2.h - C.2.i)] for each cleanup material).
 - l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAPs for all of the HAPs employed at this facility.
 - m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

* A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.
3. The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001, K002 and P001 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 approval 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 summarized the results of the modeling for the "worst-case" pollutant(s).
- Pollutant: Xylene
- TLV(mg/m3): 60.6
- Maximum Hourly Emission Rate (lbs/hr): 16.68
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 561.28
- MAGLC(ug/m3): 1,444
- Physical changes to or changes in the method of operation of the emissions unit after its installation of 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 (typically for coatings or cleanup materials), or the use of the 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.).
- 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.
- 4. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate

exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
 Emission Limitation-
 1.75 pounds of VOC per hour, excluding cleanup

 Applicable Compliance Method-
 Compliance shall be based upon the maximum hourly coating usage rate multiplied by the maximum VOC content.
 Emission Limitation-
 3.22 TPY VOC, including cleanup materials

 Applicable Compliance Method-
 Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit and shall be the summation of the 12 monthly VOC emission rates divided by 2000 lbs/ton.
 Emission Limitations-
 9.9 TPY of an individual HAP, based on a 12-month rolling summation

 Applicable Compliance Method-
 Compliance shall be based upon the record keeping requirements specified in Sections C.2. of this permit.
 Emission Limitations-
 24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

 Applicable Compliance Method-
 Compliance shall be based upon the record keeping requirements specified in Sections C.2. of this permit.

F. Miscellaneous Requirements

1. The terms and conditions from Section A.2.b., Section C.2.. and Section D.1. are federally enforceable.

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Facility ID: 0812760577 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Prep Station	OAC rule 3745-31-05(A)(3) PTI 08-04477	Volatile Organic Compounds (VOC) emissions shall not exceed the following: 1.75 pounds per hour and 1.58 tons per year (TPY). The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this

rule pursuant to OAC rule 3745-21-09 (U)(2)(c).

OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V permitting requirements See Section A.2.b.

2. Additional Terms and Conditions

- (a) The 1.75 pounds of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
The emissions of Hazardous Air Pollutants (HAPs), as identified in section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit to determine annual VOC emissions:
- The name and identification number of each coating employed.
 - The volume, in gallons, of each coating employed.
 - The VOC content of each coating, as applied, in pounds per gallon.
 - The name and identification of each cleanup material employed.
 - The number of gallons of each cleanup material employed.
 - The number of gallons of each cleanup material drummed for shipment off-site.
 - The VOC content of each cleanup material, in pounds per gallon.
 - The total VOC emissions from all coatings and cleanup materials employed, in lbs/month, (i.e., the summation of the products of C.1.b X C.1.c for each coating material plus the sum of the products of [(C.1.e - C.1.f) X C.1.g] for each cleanup material).
2. The permittee shall collect and record the following information each month for emissions units K001, K002 and P001:
- The name and identification of each coating material employed.
 - The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied..
 - The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).
 - The number of gallons of each coating material employed.
 - The name and identification of each cleanup material employed.
 - The individual HAP content of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents form C.2.f).
 - The number of gallons of each cleanup material employed.
 - The number of gallons of each cleanup material drummed for shipment off-site.
 - The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b X C.2.d for each coating material plus the sum of the products of [C.2.f X (C.2.h - C.2.i)] for each cleanup material).
 - The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c X C.2.d for each coating material plus the sum of the products of [C.2.g X (C.2.h - C.2.i)] for each cleanup material).
 - The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAPs for all of the HAPs employed at this facility.
 - The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.
- * A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.
3. The permit to install for this emissions unit P001 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001, K002 and P001 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 approval 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 summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Xylene

TLV(mg/m3): 60.6

Maximum Hourly Emission Rate (lbs/hr): 16.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 561.28

MAGLC(ug/m3): 1,444

Physical changes to or changes in the method of operation of the emissions unit after its installation of 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 (typically for coatings or cleanup materials), or the use of the 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.).

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.

4. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

Emission Limitation-
1.75 pounds of VOC per hour, excluding cleanup

Applicable Compliance Method-
Compliance shall be based upon the maximum hourly coating usage rate multiplied by the maximum VOC content.

Emission Limitation-
1.58 TPY VOC, including cleanup materials

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit and shall be the summation of the 12 monthly VOC emission rates divided by 2000 lbs/ton.

Emission Limitations-

9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Sections C.2. of this permit.

Emission Limitations-

24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Sections C.2. of this permit.

F. **Miscellaneous Requirements**

1. The terms and conditions from Section A.2.b., Section C.2. and Section D.1. are federally enforceable.