



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 13-03514**

**DATE: 6/18/2002**

Hinkley Lighting  
Matt McKnight  
12600 Berea Road  
Cleveland, OH 44111-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 0 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,

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CBAPC

PA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

**DRAFT MODIFICATION OF PERMIT TO INSTALL 13-03514**

Application Number: 13-03514  
APS Premise Number: 1318288199  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Hinkley Lighting  
Person to Contact: Matt McKnight  
Address: 12600 Berea Road  
Cleveland, OH 44111-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:

**12600 Berea Road  
Cleveland, Ohio**

Description of proposed emissions unit(s):

**-change PTI allowable for VOC to 23.2 TPY -remove source L001 from PTI -change description for P001 to 4 buffing machines.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Hinkley Lighting

PTI Application: 13-03514

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1318288199

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.10 below if no deviations occurred during the quarter.

**Hinkley Lighting**

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## **7. 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.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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**Facility ID: 1318288199**

shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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#### **10. Permit To Operate Application**

- 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **11. 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.

#### **12. 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.

**Hinkley Lighting**  
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**B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

**4. 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

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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.

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

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

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

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**C. 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>
TSP	15.5 (includes 8.23 TPY of Nitric Acid)
VOC	23.2

**Hinkley Lighting**

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Hinkle  
PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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 - Three work tables which paint is applied by cloth MODIFIED	OAC rule 3745-21-09(U)(2)(e)(ii)	coating usage shall not exceed 3 gallons of coating in any one day
	OAC rule 3745-31-05(A)(3)	19.92 lbs/day and 3.64 TPY of VOC emissions from coatings
		16.58 lbs/day and 3.03 TPY of VOC clean-up emissions
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U)(2)(e)(ii).

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each day for the coating line:

**Hinkley**

**PTI A**

Emissions Unit ID: K001

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- a. The name and identification number of each coating employed.
- b. The volume, in gallons, of all of the coatings employed.

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- c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The VOC content of each coating, as applied, in pounds per gallon.
  - e. The total VOC emission rate for all coatings, in pounds per day.
  - f. The total VOC emission rate for all cleanup materials, in pounds per day.
3. The permittee shall collect and record the total VOC emission from all coatings and cleanup materials employed, in tons, for this emissions unit for the purpose of determining annual VOC emissions.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit exceeds the applicable maximum daily emission rate. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

**V. Testing Requirements**

1. Emission Limitation -

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**Hinkle**

**PTI A**

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

Emissions Unit ID: K001

Coating usage shall not exceed 3 gallons of coating in any one day.

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

2. Emission Limitation -

19.92 lbs/day and 3.64 TPY of VOC emissions from coatings

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

3. Emission Limitation -

16.58 lbs/day and 3.03 TPY of VOC clean-up emissions

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

**VI. Miscellaneous Requirements**

None

Hinkley

PTI A

Emissions Unit ID: K001

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**B. State Only Enforceable Section**

**I. 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 - Three work tables which paint is applied by cloth MODIFIED		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Hinkley**

**PTI A**

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

Emissions Unit ID: K001

Hinkle  
PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
K002 - Paint spray booth for metal parts and fixtures MODIFIED	OAC rule 3745-21-09 (U)(2)(e)(ii)	coating usage shall not exceed 3 gallons of coating in any one day
	OAC rule 3745-17-11(B)	0.551 lb/hr of particulate emissions
	OAC rule 3745-17-07(A)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-31-05(A)(3)	19.77 lbs/day and 3.61 TPY of VOC emissions from coatings
		See I.2.a.
		16.58 lbs/day and 3.03 TPY of VOC clean-up emissions
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U)(2)(e)(ii), OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-11(B).

**2. Additional Terms and Conditions**

**Hinkle**

**PTI A**

Emissions Unit ID: K002

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

- 2.a** The use of exhaust filters for control of particulate emissions is required to satisfy the BAT requirements in OAC 3745-31-05(A)(3).

**Issued: To be entered upon final issuance****II. Operational Restrictions**

1. The permittee shall operate exhaust filters for the control of particulate emissions when this emission unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of all of the coatings employed.
  - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The VOC content of each coating, as applied, in pounds per gallon.
  - e. The total VOC emission rate for all coatings, in pounds per day
  - f. The total VOC emission rate for all cleanup materials, in pounds per day.
3. The permittee shall collect and record the total VOC emissions from all coatings and cleanup materials employed, in tons, for this emissions unit for the purpose of determining annual VOC emissions.
4. The permittee shall maintain daily records and document any time periods when the exhaust filters was not in service when this emissions unit was in operation.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such

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Emissions Unit ID: K002

record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the exhaust filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit exceeds the applicable maximum daily emission rate. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

## **V. Testing Requirements**

1. Emission Limitation -

Coating usage shall not exceed 3 gallons of coating in any one day.

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

2. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

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CE = fractional control efficiency of the control equipment

## 3. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

## 4. Emission Limitation -

19.77 lbs/day and 3.61 TPY of VOC emissions from coatings

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

## 5. Emission Limitation -

2.41 TPY of particulate emissions

Applicable Compliance Method -

Compliance will be based on the testing requirement in section A.V.2. This lb/hr emission rate is multiplied by the operating hours of the emissions unit (the worst case of 8760 hours/year) and divided by 2000 lb/ton to calculate the TPY emission rate.

## 6. Emission Limitation -

16.58 lbs/day and 3.03 TPY of VOC clean-up emissions

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

**VI. Miscellaneous Requirements**

None

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PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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>
K002 - Paint spray booth for metal parts and fixtures MODIFIED		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

#### A. State and Federally Enforceable Section

##### I. 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 - Clear dip coating line  MODIFIED	OAC 3745-21-09 (U)(2)(e)(ii)  OAC rule 3745-31-05(A)(3)	coating usage shall not exceed 3 gallons of coating in any one day  19.32 lbs/day and 3.53 TPY of VOC emissions from coatings  no cleanup emissions  The requirements of this rule also include compliance with the requirements of OAC 3745-21-09 (U)(2)(e)(ii).

2. **Additional Terms and Conditions**

- 2.a None

##### II. Operational Restrictions

None

##### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of all of the coatings employed.
  - c. The total volume, in gallons, of all of the coatings employed.

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**PTI A**

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

Emissions Unit ID: K003

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

2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all of the coatings employed
  - d. the VOC content of each coating, in pounds per gallon
  - e. the total VOC emission rate for all coatings, in pounds per day.
3. The permittee shall collect and record the total VOC emissions from all coatings employed, in tons, for this emissions unit for the purpose of determining annual VOC emissions.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit exceeds the applicable maximum daily emission rate. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

**V. Testing Requirements**

1. Emission Limitation -

Coating usage shall not exceed 3 gallons of coating in any one day.

Applicable Compliance Method -

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Emissions Unit ID: K003

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

Compliance shall be based upon the recordkeeping requirement in Section A.III.

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Emissions Unit ID: K003

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

2. Emission Limitation -

19.32 lbs/day and 3.53 TPY of VOC emissions from coatings

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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 - Clear dip coating line		
MODIFIED		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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PTI A

Emissions Unit ID: K004

**Issued: To be entered upon final issuance****Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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 - Spray booth and a spray gun to apply coatings to parts/metal fixtures  MODIFIED	OAC rule 3745-21-09 (U)(2)(e)(ii)	coating usage shall not exceed 3 gallons of coating in any one day
	OAC rule 3745-17-11(B)	0.551 lb/hr of particulate emissions
	OAC rule 3745-17-07(A)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-31-05(A)(3)	19.80 lbs/day and 3.61 TPY of VOC emissions from coatings  14.79 lbs/day and 2.70 TPY of VOC clean-up emissions  2.41 TPY of particulate emissions  See I.2.a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U)(2)(e)(ii), OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-11(B).

**2. Additional Terms and Conditions**

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Emissions Unit ID: K004

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- 2.a** The use of exhaust filters for control of particulate emissions is required to satisfy the BAT requirements in OAC 3745-31-05(A)(3).

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## **II. Operational Restrictions**

1. The permittee shall operate exhaust filters for the control of particulate emissions when this emission unit is in operation.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of all of the coatings employed.
  - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The VOC content of each coating, as applied, in pounds per gallon.
  - e. The total VOC emission rate for all coatings, in pounds per day.
  - f. The total VOC emission rate for all cleanup materials, in pounds per day.
3. The permittee shall collect and record the total VOC emissions from all coatings and cleanup materials employed, in tons, for this emissions unit for the purpose of determining annual VOC emissions.
4. The permittee shall maintain daily records and document any time periods when the exhaust filters was not in service when this emissions unit was in operation.

## **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such

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- record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the exhaust filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
  3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
  4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit exceeds the applicable maximum daily emission rate. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

**V. Testing Requirements**

1. Emission Limitation -

Coating usage shall not exceed 3 gallons of coating in any one day.

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

2. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions rate (lbs/hr)

Emissions Unit ID: K004

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

3. Emission Limitation -

20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

4. Emission Limitation -

19.80 lbs/day and 3.61 TPY of VOC emissions from coatings

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

5. Emission Limitation -

2.41 TPY of particulate emissions

Applicable Compliance Method -

Compliance will be based on the testing requirement in section A.V.2. This lb/hr emission rate is multiplied by the operating hours of the emissions unit (the worst case of 8760 hours/year) and divided by 2000 lb/ton to calculate the TPY emission rate.

6. Emission Limitation -

14.79 lbs/day and 2.70 TPY of VOC clean-up emissions

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.

## **VI. Miscellaneous Requirements**

None

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Emissions Unit ID: K004

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. 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 - Spray booth and a spray gun to apply coatings to parts/metal fixtures		
MODIFIED		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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None

Emissions Unit ID: K004

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Emissions Unit ID: P001

**Issued: To be entered upon final issuance****Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
P001 - Four (4) buffing machines for metal parts connected to a common baghouse	OAC rule 3745-17-07 (A)(1)	20% opacity as a six minute average
	OAC rule 3745-17-11(B)	0.551 lb/hr of particulate emissions
	OAC rule 3745-31-05(A)(3)	2.41 TPY of particulate emissions
		See I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-11(B).

**2. Additional Terms and Conditions**

- 2.a The use of a baghouse for control of particulate emissions is required to satisfy the BAT requirements in OAC 3745-31-05(A)(3).

**II. Operational Restrictions**

1. The permittee shall operate a cyclone and baghouse for control of particulate emissions while this emissions unit is in operation.
2. The pressure drop across the baghouse shall be maintained within the range of 1.0 to 4.3 inches of water while the emissions unit is in operation.

**Hinkley Lighting**  
**PTI Application: 13 03514**  
**Issued**

**Facility ID: 1318288199**

Emissions Unit ID: P001

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Emissions Unit ID: P001

**Issued: To be entered upon final issuance****III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified.

**V. Testing Requirements**

1. Emission Limitation -

20 % opacity , as a 6-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation -

0.551 lb/hr of particulate emissions

Applicable Compliance Method(s) -

Compliance shall be determined by multiplying the permittee's estimated uncontrolled emission rate of 1.02 lb/hr by the efficiency of the control equipment 85%.

3. Emission Limitation -

2.41 TPY of particulate emissions

Applicable Compliance Method(s) -

Compliance shall be determined by multiplying the emission rate calculated in Section A.V.2 by

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**PTI A**

Emissions Unit ID: P001

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8760 hrs/yr and dividing by 2000 lbs/ton to arrive at the TPY emission rate.

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**VI. Miscellaneous Requirements**

Emissions Unit ID: P001

None

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Emissions Unit ID: P001

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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>
P001 - Four (4) buffing machines for metal parts connected to a common baghouse		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

Emissions Unit ID: P001

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Emissions Unit ID: P002

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P002 - Bright nickel and brass plating line used for miscellaneous lighting fixtures  MODIFIED	OAC rule 3745-17-07(A)(1)	20% opacity as a six-minute average (less stringent than OAC rule 3745-31-05(A)(3))
	OAC rule 3745-17-11(B)	1.88 lbs/hr of particulate emissions
	OAC rule 3745-31-05(A)(3)	0% opacity as a six-minute average  8.23 TPY nitric acid as mist (also PE)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B).

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information:

**Hinkley Lighting**  
**PTI Application: 13-03514**  
**Issued**

**Facility ID: 1318288199**

Emissions Unit ID: P002

- a. All material used in process at maximum production rate.
- b. The usage rate (in lbs/month and lbs/yr) of each material used.
- c. The annual operating hours of the emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any exceedances of the applicable emission limitations. A copy of such record shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the date of the excursion. Accompanying the record, the permittee shall indicate, in writing, the probable cause(s) of the excursion(s) and the steps which have been implemented to correct the violation(s) and prevent any such future occurrences.

#### **V. Testing Requirements**

1. Emission Limitation -

0% opacity, as a six-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

2. Emission Limitation -

1.88 lb/hr of particulate emissions, 8.23 TPY nitric acid as mist (PE)

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III..

The lb/hr emission rate is multiplied by the annual operating hours of the emissions unit (the worst case of 8760 hours/year) and divided by 2000 to obtain the TPY emission rate.

#### **VI. Miscellaneous Requirements**

None

**Hinkley  
PTI A**

Emissions Unit ID: P002

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

**B. State Only Enforceable Section**

**I. 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>
P002 - Bright nickel and brass plating line used for miscellaneous lighting fixtures		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None