



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
ALLEN COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 03-3208**

**DATE: October 14, 1999**

S+S Superior of Ohio Inc.  
Jerry Berendsen  
PO Box 1981  
Lima, OH 45804

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

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

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

Very truly yours,

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

cc: USEPA  
DAPC, NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

**Issue Date: October 14, 1999**

**FINAL PERMIT TO INSTALL 03-3208**

Application Number: 03-3208  
APS Premise Number: 0302020314  
Permit Fee: **\$11600**  
Name of Facility: S+S Superior of Ohio Inc.  
Person to Contact: Jerry Berendsen  
Address: PO Box 1981  
Lima, OH 45804

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2550 Central Point Parkway**  
**Lima, Ohio**

Description of proposed emissions unit(s):  
**COATING & ADHESIVE OPERATIONS ASSOCIATED WITH THE CUSTOMIZATION OF  
LIMOUSINES, FUNERAL CARS, AND SPECIALTY CARS.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
\_\_\_\_\_  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. 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.11 below if no deviations occurred during the quarter.

- 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 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.

**S+S Superior of Ohio Inc.**  
PTI Application: **03-3208**  
**October 14, 1999**

Facility ID: **0302020314**

**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.

**S+S Superior of Ohio Inc.**  
PTI Application: **03-3208**  
**October 14, 1999**

Facility ID: **0302020314**

**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. 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.

**S+S Superior of Ohio Inc.**  
PTI Application: **03-3208**  
**October 14, 1999**

Facility ID: **0302020314**

**5. Termination of Permit To Install**

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

**6. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

**7. 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.

**8. 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).

**9. 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.

**10. Construction Compliance Certification**

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

**11. 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>
OC	67.64

**S+S Superior of Ohio Inc.**  
PTI Application: **03-3208**  
**October 14, 1999**

Facility ID: **0302020314**

**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.

**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>
Autobody finishing;	OAC rule 3745-21-07 (G)(2)	None (see A.II.1)
application of body fillers,	OAC rule 3745-17-08	None (see A.I.2.a.)
body preparation, grinding and sanding; (limo line)	OAC rule 3745-17-07(B)	None (see A.I.2.b.)

**2. Additional Terms and Conditions**

- 2.a This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Allen County, outside of the city of Lima). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

**II. Operational Restrictions**

1. The use of photochemically reactive cleanup materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

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

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit;  
and,
  - b. documentation whether or not each liquid organic material employed is photochemically reactive material.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.

**V. Testing Requirements**

None.

**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>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (limo line)	OAC rule 3745-31-05	Autobody finishing operations: 102 lbs OC/day, group limit of 9.11 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from autobody finishing operations from emissions units P001-P004 shall not exceed 9.11 tons per year.
- 2.b C emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The

Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

a. Pollutant: toluene

TLV (ug/m<sup>3</sup>): 188,000

Maximum Hourly Emission Rate (lbs/hr):  
16.32

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,027

MAGLC (ug/m<sup>3</sup>): 4,476

b. Pollutant: xylene

TLV (ug/m<sup>3</sup>): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
21.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 135.2

MAGLC (ug/m<sup>3</sup>): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m<sup>3</sup>): 590,000

Maximum Hourly Emission Rate (lbs/hr):  
4.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 29.26

MAGLC (ug/m<sup>3</sup>): 14,048

**S+S Superior of Ohio Inc.**  
PTI Application: **02 2700**  
**Octob**

Facility ID: **0302020314**

Emissions Unit ID: **P001**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

- e. Pollutant: styrene

TLV (ug/m<sup>3</sup>): 85,000

Maximum Hourly Emission Rate (lbs/hr):  
29.66

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 451.6

MAGLC (ug/m<sup>3</sup>): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would

result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds; and,
  - e. the total emissions of OC from all autobody finishing material (body filler) employed

(summation of d), in pounds.

2. The permittee shall calculate and record the following information each day for emissions units P001-P004:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds; and,
  - e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds.
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all autobody finishing material (body filler) employed, (summation of e for each calendar month to date from January 1<sup>st</sup> to December 31<sup>st</sup>).

Emissions Unit ID: **P001**

3. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
  
4. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from autobody finishing operations from emissions units P001-P004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from clean up operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily OC emission limitation from autobody finishing operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit

## V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

102 lbs OC/day

Applicable Compliance Method:

Compliance with the daily emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

- b. Emission Limitation:

9.11 tons OC/yr grouped allowable from emissions units P001-P004

Applicable Compliance Method:

**S+S Superior of Ohio Inc.**  
PTI Application: **02 2700**  
**Octob**

Facility ID: **0302020314**

Emissions Unit ID: **P001**

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

S+S S<sub>1</sub>  
PTI A<sub>1</sub>  
October 14, 1999

Emissions Unit ID: **P001**

d. Emission Limitation:

17.03 tons OC/yr from clean up operations  
from emissions units P001-P004, R001-R012  
and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the  
recordkeeping requirements specified in  
section B.III.4 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

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

**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, and/or Equipment</u>	<u>Property,</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (funeral car line station #1)		OAC rule 3745-21-07 (G)(2)	None (see A.II.1)
		OAC rule 3745-17-08	None (see A.I.2.a.)
		OAC rule 3745-17-07(B)	None (see A.I.2.b.)

**2. Additional Terms and Conditions**

- 2.a This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Allen County, outside of the city of Lima). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

**II. Operational Restrictions**

1. The use of photochemically reactive cleanup materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

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

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit; and,

**October 14, 1999**

- b. documentation whether or not each liquid organic material employed is photochemically reactive material.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (funeral car line station #1)	OAC rule 3745-31-05	Autobody finishing operations: 102 lbs OC/day; group limit of 9.11 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

2. Additional Terms and Conditions

- 2.a Combined annual OC emissions from autobody finishing operations from emissions units P001-P004 shall not exceed 9.11 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and

Emissions Unit ID: **P002**

the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

Emissions Unit ID: **P002**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds; and,
  - e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds.
2. The permittee shall calculate and record the following information each day for emissions units P001-P004:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b

Emissions Unit ID: P002

- x c), in pounds;
- e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all autobody finishing material (body filler) employed, (summation of e for each calendar month to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
3. The permittee shall calculate and record the following information each month for this emissions unit:
- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
4. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).

**October 14, 1999**

5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**October 14, 1999**

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from autobody finishing operations from emissions units P001-P004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from clean up operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily OC emission limitation from autobody finishing operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

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

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
102 lbs OC/day  
  
Applicable Compliance Method:  
  
Compliance with the daily emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.
  - b. Emission Limitation:  
  
9.11 tons OC/yr grouped allowable from emissions units P001-P004  
  
Applicable Compliance Method:  
  
Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **P002**

c. Emission Limitation:

2 tons OC/month

**October 14, 1999**

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.4 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (funeral car line station #2)	OAC rule 3745-21-07 (G)(2)	None (see A.II.1)
	OAC rule 3745-17-08	None (see A.I.2.a.)
	OAC rule 3745-17-07(B)	None (see A.I.2.b.)

**2. Additional Terms and Conditions**

- 2.a This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Allen County, outside of the city of Lima). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

**II. Operational Restrictions**

1. The use of photochemically reactive cleanup materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

**October 14, 1999**

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

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit; and,
  - b. documentation whether or not each liquid organic material employed is photochemically reactive material.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.

**V. Testing Requirements**

None.

**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>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (funeral car line station #2)	OAC rule 3745-31-05	Autobody finishing operations: 102 lbs OC/day; group limit of 9.11 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from autobody finishing operations from emissions units P001-P004 shall not exceed 9.11 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:
  - a. Pollutant: toluene

**October 14, 1999**

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

Emissions Unit ID: P003

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds; and
  - e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds.
2. The permittee shall calculate and record the following information each day for emissions units P001-P004:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds;
  - e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record

**October 14, 1999**

the annual, year to date OC emissions from all autobody finishing material (body filler) employed, (summation of e for each calendar month to date from January 1<sup>st</sup> to December 31<sup>st</sup>).

3. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
  
4. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new

Emissions Unit ID: P003

pollutants emitted, change in stack/exhaust parameters, etc.); and

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from autobody finishing operations from emissions units P001-P004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from clean up operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily OC emission limitation from autobody finishing operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

102 lbs OC/day

Applicable Compliance Method:

Compliance with the daily emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.
  - b. Emission Limitation:
 

9.11 tons OC/yr grouped allowable from emissions units P001-P004

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

**October 14, 1999**

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

**October 14, 1999**

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.4 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (specialty line)	OAC rule 3745-21-07 (G)(2)	None (see A.II.1)
	OAC rule 3745-17-08	None (see A.I.2.a.)
	OAC rule 3745-17-07(B)	None (see A.I.2.b.)

**2. Additional Terms and Conditions**

**2.a** This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Allen County, outside of the city of Lima). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

**2.b** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

**II. Operational Restrictions**

1. The use of photochemically reactive cleanup materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

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

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit; and,
  - b. documentation whether or not each liquid organic material employed is photochemically reactive material.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Autobody finishing; application of body fillers, body preparation, grinding and sanding; (specialty line)	OAC rule 3745-31-05	Autobody finishing operations: 102 lbs OC/day; group limit of 9.11 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

2. **Additional Terms and Conditions**

- 2.a Combined annual OC emissions from autobody finishing operations from emissions units P001-P004 shall not exceed 9.11 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and

**October 14, 1999**

the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

Emissions Unit ID: **P004**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds; and
  - e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds.
2. The permittee shall calculate and record the following information each day for emissions units P001-P004:
  - a. the name and identification number of each autobody finishing material (body filler) employed;
  - b. the OC content of each autobody finishing material (body filler), in pounds/gallon;
  - c. the number of gallons of each autobody finishing material (body filler) employed;
  - d. the total emissions of OC from each autobody finishing material (body filler) employed (b x c), in pounds;
  - e. the total emissions of OC from all autobody finishing material (body filler) employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record

**October 14, 1999**

the annual, year to date OC emissions from all autobody finishing material (body filler) employed, (summation of e for each calendar month to date from January 1<sup>st</sup> to December 31<sup>st</sup>).

3. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
  
4. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new

Emissions Unit ID: P004

pollutants emitted, change in stack/exhaust parameters, etc.); and,

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from autobody finishing operations from emissions units P001-P004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from clean up operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily OC emission limitation from autobody finishing operations. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit

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

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

102 lbs OC/day

Applicable Compliance Method:

Compliance with the daily emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.
  - b. Emission Limitation:
 

9.11 tons OC/yr grouped allowable from emissions units P001-P004

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

**October 14, 1999**

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

**October 14, 1999**

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.4 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Vinyl top installation (limo line)	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this

**October 14, 1999**

permit shall be used to determine compliance with the above limitations. Formulation data

or USEPA Method 24 shall be used to determine the OC content of the gluing materials and

cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Vinyl top installation (limo line)	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a** Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and

Emissions Unit ID: **R001**

comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m<sup>3</sup>): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3,027

MAGLC (ug/m<sup>3</sup>): 4,476

b. Pollutant: xylene

TLV (ug/m<sup>3</sup>): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 135.2

MAGLC (ug/m<sup>3</sup>): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m<sup>3</sup>): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 29.26

MAGLC (ug/m<sup>3</sup>): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m<sup>3</sup>): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2,626

MAGLC (ug/m<sup>3</sup>): 10,333

**October 14, 1999**

Emissions Unit ID: **R001**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in

its permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
  
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.

**October 14, 1999**

3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports

**October 14, 1999**

shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

7.3 tons OC/yr

Emissions Unit ID: **R001**

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

## VI. Miscellaneous Requirements

None.

October 14, 1999

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

**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>
Floor carpet and headliner installation (limo line)	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

**October 14, 1999**

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit

**S+S Superior of Ohio Inc.**

DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **R002**

shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Floor carpet and headliner installation (limo line)	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a);  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and

**October 14, 1999**

comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

Emissions Unit ID: **R002**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in

its permit to install; and,

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.

**October 14, 1999**

3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the

Emissions Unit ID: **R002**

monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

7.3 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

- c. Emission Limitation:

2 tons OC/month from clean up operations

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

- d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3

**October 14, 1999**

of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Funeral car quarter panel/roof assembly	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine

**October 14, 1999**

compliance with the above limitations.  
Formulation data  
or USEPA Method 24 shall be used  
to determine the OC content of the gluing  
materials and  
cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Funeral car quarter panel/roof assembly	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **R003**

Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

Emissions Unit ID: **R003**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;

Emissions Unit ID: **R003**

- d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
    - a. the name and identification number of each cleanup material employed;
    - b. the OC content of each cleanup material, in pounds/gallon;
    - c. the number of gallons of each cleanup material employed;
    - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
    - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
    - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this

**October 14, 1999**

permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

7.3 tons OC/yr

**October 14, 1999**

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2200**

Facility ID: **0302020314**

Emissions Unit ID: **R003**

None.

October 14, 1999

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

**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>
Funeral car vinyl top installation	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

**October 14, 1999**

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - e. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit

**October 14, 1999**

shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

**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>
Funeral car vinyl top installation	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

1

**October 14, 1999**

Emissions Unit ID: **R004**

MAGLC (ug/m3): 10,333

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

Emissions Unit ID: R004

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions

**October 14, 1999**

units P001-P004, R001-R012, K001-K013:

- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
7.3 tons OC/yr  
  
Applicable Compliance Method:  
  
The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.
  - b. Emission Limitation:  
  
16.5 tons OC/yr grouped allowable from emissions units R001-R012  
  
Applicable Compliance Method:  
  
Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.
  - c. Emission Limitation:  
  
2 tons OC/month  
  
Applicable Compliance Method:  
  
Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.
  - d. Emission Limitation:  
  
17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013  
  
Applicable Compliance Method:  
  
Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

**October 14, 1999**

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Funeral car headliner/interior trim installation	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

**October 14, 1999**

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit

**S+S Superior of Ohio Inc.**

DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **R005**

shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

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

None.

**October 14, 1999**

**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>
Funeral car headliner/interior trim installation	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and

**October 14, 1999**

the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

113

**S+S Superior of Ohio Inc.**

DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **R005**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;

**October 14, 1999**

- c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**S+S Superior of Ohio Inc.**DTI Application: **02 2708**Facility ID: **0302020314**Emissions Unit ID: **R005**

2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
7.3 tons OC/yr

**October 14, 1999**

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

1

**October 14, 1999**

Emissions Unit ID: **R005**

None.

October 14, 1999

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

**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>
Specialty line vinyl top installation	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

Emissions Unit ID: R006

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations.

**October 14, 1999**

Formulation data

or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Speciality line vinyl top installation	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a** Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The

Emissions Unit ID: **R006**

Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

Emissions Unit ID: **R006**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;

Emissions Unit ID: **R006**

- d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**October 14, 1999**

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

7.3 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

**S+S Superior of Ohio Inc.**

DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **R006**

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Fleetwood vinyl top installation	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

**October 14, 1999**

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing material, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit

**S+S Superior of Ohio Inc.**

DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **R007**

shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Fleetwood vinyl top installation	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable

**October 14, 1999**

Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

**October 14, 1999**

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

Emissions Unit ID: R007

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in

**October 14, 1999**

pounds.

3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports

Emissions Unit ID: **R007**

shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

7.3 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

**October 14, 1999**

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
inspection area	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

**October 14, 1999**

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

**S+S Superior of Ohio Inc.**

DTI Application: **02 2208**

Facility ID: **0302020314**

Emissions Unit ID: **R008**

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
inspection area	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a** Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and

**October 14, 1999**

comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **R008**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;

- c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the

**October 14, 1999**

monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

7.3 tons OC/yr

**October 14, 1999**

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

**October 14, 1999**

Emissions Unit ID: **R008**

None.

October 14, 1999

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

**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>
Seat assembly (trim shop)	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this

**October 14, 1999**

permit shall be used to determine compliance with the above limitations. Formulation data

or USEPA Method 24 shall be used to determine the OC content of the gluing materials and

cleanup materials.

**VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Seat assembly (trim shop)	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and

**S+S Superior of Ohio Inc.**DTI Application: **02 2700**Facility ID: **0302020314**Emissions Unit ID: **R009**

comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

**October 14, 1999**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

Emissions Unit ID: **R009**

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

Emissions Unit ID: R009

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions

**October 14, 1999**

units P001-P004, R001-R012, K001-K013:

- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
7.3 tons OC/yr  
  
Applicable Compliance Method:  
  
The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.
  - b. Emission Limitation:  
  
16.5 tons OC/yr grouped allowable from emissions units R001-R012  
  
Applicable Compliance Method:  
  
Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.
  - c. Emission Limitation:  
  
2 tons OC/month  
  
Applicable Compliance Method:  
  
Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.
  - d. Emission Limitation:  
  
17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013  
  
Applicable Compliance Method:  
  
Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing

materials and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Door panels (trim shop)	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

**October 14, 1999**

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds;
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit

**S+S Superior of Ohio Inc.**

DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **R010**

shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used to determine the OC content of the gluing materials and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Door panels (trim shop)	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable

**October 14, 1999**

Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

1

**October 14, 1999**

Emissions Unit ID: **R010**

MAGLC (ug/m3): 10,333

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

Emissions Unit ID: R010

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup> ).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:

**October 14, 1999**

- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

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

Emissions Unit ID: **R010**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
7.3 tons OC/yr  
  
Applicable Compliance Method:  
  
The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.
  - b. Emission Limitation:  
  
16.5 tons OC/yr grouped allowable from emissions units R001-R012  
  
Applicable Compliance Method:  
  
Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.
  - c. Emission Limitation:  
  
2 tons OC/month  
  
Applicable Compliance Method:  
  
Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.
  - d. Emission Limitation:  
  
17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013  
  
Applicable Compliance Method:  
  
Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

**October 14, 1999**

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Wheel house panel fabrication (trim shop)	OAC rule 3745-21-07 (G)(2)	Gluing operations: 8 lbs OC/hr, 40 lbs OC/day  Cleanup operations: none (see A.II.1)

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed; and,
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

2. The permittee shall collect and record the following information each day for gluing operations:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds;
  - f. the total number of hours the emissions unit was in operation; and,
  - g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine

**October 14, 1999**

compliance with the above limitations.  
Formulation data  
or USEPA Method 24 shall be used  
to determine the OC content of the gluing  
materials and  
cleanup materials.

**VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Wheel house panel fabrication (trim shop)	OAC rule 3745-31-05	Gluing operations: 7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and

**October 14, 1999**

comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene  
TLV (ug/m3): 188,000  
Maximum Hourly Emission Rate (lbs/hr): 16.32  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027  
MAGLC (ug/m3): 4,476
- b. Pollutant: xylene  
TLV (ug/m3): 434,000  
Maximum Hourly Emission Rate (lbs/hr): 21.78  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2  
MAGLC (ug/m3): 10,333
- c. Pollutant: methyl ethyl ketone  
TLV (ug/m3): 590,000  
Maximum Hourly Emission Rate (lbs/hr): 4.62  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26  
MAGLC (ug/m3): 14,048
- d. Pollutant: ethyl benzene  
TLV (ug/m3): 434,000  
Maximum Hourly Emission Rate (lbs/hr): 6.79  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626  
MAGLC (ug/m3): 10,333

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;
  - b. the OC content of each gluing material, in pounds/gallon;
  - c. the number of gallons of each gluing material employed;
  - d. the total emissions of OC from each gluing material employed (b x c), in pounds;
  - e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;

Emissions Unit ID: R011

- d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
    - a. the name and identification number of each cleanup material employed;
    - b. the OC content of each cleanup material, in pounds/gallon;
    - c. the number of gallons of each cleanup material employed;
    - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
    - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
    - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**October 14, 1999**

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

7.3 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

- c. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

- d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

**October 14, 1999**

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

vwvwwvwwfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

SELECT

**VI. Miscellaneous 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

October 14, 1999

vwvfvfvfvfwefwfwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

the table.

Operations, Property,  
and/or Equipment

Interior trim panel fabrication (trim  
shop)

Applicable Rules/Requirements

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

OAC rule 3745-21-07 (G)(2)

Applicable Emissions Limitations/Control Measures

Gluing operations:  
8 lbs OC/hr, 40 lbs OC/day

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Cleanup operations:  
none (see A.II.1)

**2. Additional Terms and Conditions**

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

2.a None.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- 1. The permittee shall collect and record the following information each day for cleanup operations:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

reactive material;

2. The permittee shall collect and record the following information each day for gluing operations:

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

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- b. the OC content of each gluing material, in pounds/gallon;
- c. the number of gallons of each gluing material employed;

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- d. the total emissions of OC from each gluing material employed (b x c), in pounds;
- e. the total emissions of OC from all gluing material employed (summation of d), in pounds.
- f. the total number of hours the emissions unit was in operation; and,

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

g. the average hourly organic compound emission rate for all gluing materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The gluing information must be for the glues as employed, including any thinning solvents

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**IV. Reporting Requirements**

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

- a. An identification of each day during which the average hourly organic compound emissions from the gluing materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

b. An identification of each day during which the organic compound emissions from the gluing materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- 2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive cleanup material was employed.

**V. Testing Requirements**

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitations. Formulation data or USEPA Method 24 shall be used

**October 14, 1999**

vvvvvvvvvfwefwf**A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

to determine the OC content of the gluing materials and cleanup materials.

**VI. Miscellaneous Requirements**

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

None.

October 14, 1999

vwvwwvwwfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing 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.

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

SELECT

**VI. Miscellaneous Requirements**

Operations, Property,  
and/or Equipment

fabrication (trim shop)

Applicable  
Rules/Requirements

Interior trim panel

OAC rule 3745-31-05

vvvvvvvvvfwefwfwf**A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

SELECT

**VI. Miscellaneous Requirements**

October 14, 1999

wwwwwwwwfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Gluing operations:

7.3 tons OC/yr; group limit of 16.5 tons OC/yr (see B.I.2.a)

Cleanup operations:

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

**2. Additional Terms and Conditions**

2.a Combined annual OC emissions from gluing operations from emissions units R001-R012 shall not exceed 16.5 tons per

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

year.

**2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

(Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable

**October 14, 1999**

vvvvvvvvvfwefwf**A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

October 14, 1999

vvvvvvvvwfwefwfwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

October 14, 1999

vvvvvvvvwfwefwfwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

vvvvvvvvvfwefwf**A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the coatings or cleanup materials used, or use of new

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

SELECT

**VI. Miscellaneous Requirements**

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

vvvvvvvvvfwefwfwf**A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

SELECT

**VI. Miscellaneous Requirements**

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

"modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- 1. The permittee shall calculate and record the following information each day for emissions units R001-R012:
  - a. the name and identification number of each gluing material employed;

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

b. the OC content of each gluing material, in pounds/gallon;

c. the number of gallons of each gluing material employed;

d. the total emissions of OC from each gluing material employed (b x c), in pounds;

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

e. the total emissions of OC from all gluing material employed (summation of d), in pounds; and,

f. in conjunction with the daily recordkeeping above the permittee shall calculate and record

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

the annual, year to date OC emissions from all gluing material employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).

- 2. The permittee shall calculate and record the following information each month for this emissions unit:

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- a. the name and identification number of each cleanup material employed;
- b. the OC content of each cleanup material, in pounds/gallon;

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- c. the number of gallons of each cleanup material employed;
- d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
- e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:

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

October 14, 1999

vwvwwvwwfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- b. the OC content of each cleanup material, in pounds/gallon;
- c. the number of gallons of each cleanup material employed;

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
- e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).

- 4. The permittee shall collect and record the following information for each change where the air

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**IV. Reporting Requirements**

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- 1. The permittee shall submit annual reports that summarize the actual annual OC emissions from gluing operations from emissions units R001-R012. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

- 2. The permittee shall submit annual reports that summarize the actual annual OC emissions from

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations from this emissions unit. The reports

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

SELECT

**VI. Miscellaneous Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

7.3 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/day (see A.I) limitation by the

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

**October 14, 1999**

vvvvvvvvvfwefwf**A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

16.5 tons OC/yr grouped allowable from emissions units R001-R012

Applicable Compliance Method:

October 14, 1999

vwvwwvwwfwefwfwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

c. Emission Limitation:

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping

**October 14, 1999**

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

requirements specified in section B.III.2 of this permit.

d. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3

October 14, 1999

vvvvvvvvvfwefwf **A. State and Federally Enforceable Section**  
**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the gluing materials and cleanup materials.

October 14, 1999

vwvwwvwwfwefwf **A. State and Federally Enforceable Section**

**Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Main paint booth (limo line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.

**October 14, 1999**

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

**October 14, 1999**

**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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **K001**

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Main paint booth (limo line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a** Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c** Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

**October 14, 1999**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

271

**S+S Superior of Ohio Inc.**

DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **K001**

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

**October 14, 1999**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

**October 14, 1999**

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;

**October 14, 1999**

- b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January

Emissions Unit ID: **K001**

31 of each year and shall cover the previous calendar year.

2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon, and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

**October 14, 1999**

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

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

**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>
Funeral car prime booth	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.
- 2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**October 14, 1999**

#### **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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

**October 14, 1999**

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Funeral car prime booth	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

Emissions Unit ID: **K002**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

- d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

**October 14, 1999**

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in

Emissions Unit ID: **K002**

its permit to install; and,

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds; and
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds.
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.

**October 14, 1999**

3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

**October 14, 1999**

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
prime booth (limo line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.

**October 14, 1999**

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

#### 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
prime booth (limo line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

**October 14, 1999**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

**S+S Superior of Ohio Inc.**

DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **K003**

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

**October 14, 1999**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

**October 14, 1999**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;

Emissions Unit ID: **K003**

- d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
    - a. the name and identification number of each cleanup material employed;
    - b. the OC content of each cleanup material, in pounds/gallon;
    - c. the number of gallons of each cleanup material employed;
    - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
    - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and
    - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**October 14, 1999**

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

- d. Emission Limitation:

2 tons OC/month

**S+S Superior of Ohio Inc.**

DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **K003**

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Main paint booth (funeral car line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.

**October 14, 1999**

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

**October 14, 1999**

#### **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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**S+S Superior of Ohio Inc.**

DTI Application: **02 2208**

Facility ID: **0302020314**

Emissions Unit ID: **K004**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Main paint booth (funeral car line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a** Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c** Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

October 14, 1999

## II. Operational Restrictions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

**October 14, 1999**

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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

**October 14, 1999**

Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,

**October 14, 1999**

- f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

- 1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

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

- 1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

Emissions Unit ID: **K004**

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon, and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

Emissions Unit ID: **K004**

**October 14, 1999**

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
small parts paint booth	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.

Emissions Unit ID: **K005**

- c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

#### 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

**October 14, 1999**

CE = control efficiency of the control equipment  
(assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
small parts paint booth	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per

**October 14, 1999**

year.

- 2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c** Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

## **II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

Emissions Unit ID: K005

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

**October 14, 1999**

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains

**October 14, 1999**

documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,

- e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
    - a. the name and identification number of each cleanup material employed;
    - b. the OC content of each cleanup material, in pounds/gallon;
    - c. the number of gallons of each cleanup material employed;
    - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
    - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
    - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**October 14, 1999**

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon, and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

**October 14, 1999**

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting 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

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

the table.

Operations, Property, and/or Equipment	fleetwood prime booth
--	-----------------------

Applicable Rules/Requirements

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

OAC rule 3745-21-09 (U)(2)(e)(ii)

OAC rule 3745-17-11 (B)(1)

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

OAC rule 3745-17-07 (A)  
 Applicable Emissions  
Limitations/Control Measures

Coating usage not to exceed ten gallons per day.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

0.551 lb PE/hr

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

**2. Additional Terms and Conditions**

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

2.a None.

**II. Operational Restrictions**

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- 1. The permittee shall operate the dry filtration system whenever this emissions 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:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

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

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- c. The total volume, in gallons, of all of the coatings employed.
- 2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

**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

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

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 Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- 1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a, Emission Limitation:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

E = particulate matter emissions rate (lbs/hr)

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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 (60% considering 40 CFR 60.453)

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

b. Emission Limitation:

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

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- c. Emission Limitation: Coating usage not to exceed ten gallons per day;

Applicable compliance method: The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

**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

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

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.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Operations, Property,  
and/or Equipment

fleetwood prime booth  
Applicable Rules/Requirements

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Applicable Emissions Limitations/Control Measures

Coating operations:

59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)

(see B.I.2.c.)

**2. Additional Terms and Conditions**

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

**2.a** Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.

**2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

K001-K013 shall not exceed 17.03 tons/yr.

- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

**II. Operational Restrictions**

- 1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

- d. Pollutant: ethyl benzene

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the coatings or cleanup materials used, or use of new

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

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

- 1. The permittee shall calculate and record the following information each day for emissions units K001-K013:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- a. the name and identification number of each coating material employed;
- b. the OC content of each coating material, in pounds/gallon;

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- c. the number of gallons of each coating material employed;
- d. the total emissions of OC from each coating material employed (b x c), in pounds;
- e. the total emissions of OC from all coating material employed (summation of d), in

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

pounds; and,

- f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup> ).

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- 2. The permittee shall calculate and record the following information each month for this emissions unit:

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

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

- b. the OC content of each cleanup material, in pounds/gallon;
- c. the number of gallons of each cleanup material employed;

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
- e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- 3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:

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

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- b. the OC content of each cleanup material, in pounds/gallon;
- c. the number of gallons of each cleanup material employed;
- d. the total emissions of OC from each cleanup material employed (b x c), in pounds;

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,

f. in conjunction with the monthly recordkeeping above the permittee shall calculate and

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).

- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
- b. a copy of the resulting computer model runs that show the results of the application of the

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Air Toxic Policy for the change.

**IV. Reporting Requirements**

- 1. The permittee shall submit annual reports that summarize the actual annual OC emissions from

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

- 2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

be submitted by January 31 of each year and shall cover the previous calendar year.

- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

**V. Testing Requirements**

- 1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

a. Emission Limitation:

59.2 lbs OC/day

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation,

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

compliance will also be shown with the daily OC limitation.

b. Emission Limitation:

10.8 tons OC/yr

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

SELECT

**V. Testing Requirements**

and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

of this permit.

- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

October 14, 1999

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

**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.

Operations, Property, and/or Equipment

SELECT

Applicable Rules/Requirements

SELECT

Applicable Emissions Limitations/Control Measures

SELECT

**2. Additional Terms and Conditions**

2.a SELECT

**II. Operational Restrictions**

SELECT

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

SELECT

**IV. Reporting Requirements**

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Main paint booth (fleetwood line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.

**October 14, 1999**

- c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**October 14, 1999**

**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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

**October 14, 1999**

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**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>
Main paint booth (fleetwood line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

**October 14, 1999**

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

**October 14, 1999**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new

Emissions Unit ID: **K007**

coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;

**October 14, 1999**

- b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

Emissions Unit ID: **K007**

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**October 14, 1999**

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

**October 14, 1999**

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
prime booth (limo line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.

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

**October 14, 1999**

**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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

**October 14, 1999**

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
prime booth (limo line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

**October 14, 1999**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

424

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **K008**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

**October 14, 1999**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new

**October 14, 1999**

coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

**October 14, 1999**

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;

Emissions Unit ID: **K008**

- b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
    - a. the name and identification number of each cleanup material employed;
    - b. the OC content of each cleanup material, in pounds/gallon;
    - c. the number of gallons of each cleanup material employed;
    - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
    - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
    - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**October 14, 1999**

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon, and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

**October 14, 1999**

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

- d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

- e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

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

**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>
Main paint booth (specialty line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.
- 2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**October 14, 1999**

#### **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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

**October 14, 1999**

**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>
Main paint booth (specialty line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

**October 14, 1999**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

**October 14, 1999**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

- d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

- e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new

Emissions Unit ID: **K009**

coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions

**October 14, 1999**

unit:

- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**IV. Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

**October 14, 1999**

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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>
Service department	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.

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

**October 14, 1999**

#### **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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

**October 14, 1999**

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Service department	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

**October 14, 1999**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 4.62

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **K010**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

**October 14, 1999**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new

**October 14, 1999**

coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

**October 14, 1999**

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;

Emissions Unit ID: **K010**

- b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
- a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**October 14, 1999**

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

**October 14, 1999**

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

- d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

- e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## **VI. Miscellaneous Requirements**

None.

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

**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>
Service department prep pad	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**October 14, 1999**

**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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**S+S Superior of Ohio Inc.**

DTI Application: **02 2208**

Facility ID: **0302020314**

Emissions Unit ID: **K011**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
Service department prep pad	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per

**October 14, 1999**

year.

**2.b** OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.

**2.c** Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

a. Pollutant: toluene

October 14, 1999

Emissions Unit ID: **K011**

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr):  
16.32

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
21.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

c. Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):  
4.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

**October 14, 1999**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
6.79

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr):  
29.66

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not

Emissions Unit ID: **K011**

including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

**October 14, 1999**

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all

**October 14, 1999**

coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).

2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
  
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

**October 14, 1999**

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

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

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily

Emissions Unit ID: **K011**

OC limitation.

b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012

**October 14, 1999**

and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

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

**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, and/or Equipment</u>	<u>Property,</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
prototype booth		OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
		OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
		OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.

- c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

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 (60% considering 40 CFR 60.453)

**October 14, 1999**

CE = control efficiency of the control  
equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**October 14, 1999**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**VI. Miscellaneous Requirements**

None.

October 14, 1999

**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>
prototype booth	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

**II. Operational Restrictions**

**October 14, 1999**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr):  
16.32

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
21.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

476

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **K012**

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):  
4.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

**October 14, 1999**

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
6.79

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr):  
29.66

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not

**October 14, 1999**

including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the coatings or cleanup materials used, or use of new coatings or cleanup materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

**October 14, 1999**

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,
  - f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).

Emissions Unit ID: **K012**

2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
  
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and ,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
  
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### IV. Reporting Requirements

**October 14, 1999**

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

b. Emission Limitation:

10.8 tons OC/yr

October 14, 1999

Emissions Unit ID: **K012**

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon, and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012

**S+S Superior of Ohio Inc.**  
DTI Application: **02 2708**

Facility ID: **0302020314**

Emissions Unit ID: **K012**  
and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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

None.

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

**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>
prep pad booth (funeral car line)	OAC rule 3745-21-09 (U)(2)(e)(ii)	Coating usage not to exceed ten gallons per day.
	OAC rule 3745-17-11 (B)(1)	0.551 lb PE/hr
	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions 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 each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.

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

#### **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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration 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 Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.551 lb/hr particulate emissions (PE)

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$  particulate matter emissions rate (lbs/hr)

$E =$  maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

Emissions Unit ID: **K013**

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

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

**S+S Superior of Ohio Inc.**

DTI Application: **02 2700**

Facility ID: **0302020314**

Emissions Unit ID: **K013**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

c. Emission Limitation:

Coating usage not to exceed ten gallons per day

Applicable compliance method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

**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>
prep pad booth (funeral car line)	OAC rule 3745-31-05	Coating operations: 59.2 lbs/day; 10.8 tons OC/yr; group limit of 25 tons OC/yr (see B.I.2.a)  Cleanup operations: 2 tons OC/month; group limit of 17.03 tons OC/yr (see B.I.2.b)  (see B.I.2.c.)

**2. Additional Terms and Conditions**

- 2.a Combined annual OC emissions from coating operations from emissions units K001-K013 shall not exceed 25 tons per year.
- 2.b OC emissions from cleanup operations from emissions units P001-P004, R001-R012 and K001-K013 shall not exceed 17.03 tons/yr.
- 2.c Best available technology for particulate emissions for this emissions unit has been determined to be compliance with OAC rule 3745-17-11, see A.I. and A.V. of the State and Federal section of this permit.

## II. Operational Restrictions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant from the combined emissions of P001-P004, R001-R012, K001-K013:

- a. Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr):  
16.32

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

- b. Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
21.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

- c. Pollutant: methyl ethyl ketone

Emissions Unit ID: **K013**

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr):  
4.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

d. Pollutant: ethyl benzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr):  
6.79

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

e. Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr):  
29.66

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for emissions units K001-K013:
  - a. the name and identification number of each coating material employed;
  - b. the OC content of each coating material, in pounds/gallon;
  - c. the number of gallons of each coating material employed;
  - d. the total emissions of OC from each coating material employed (b x c), in pounds;
  - e. the total emissions of OC from all coating material employed (summation of d), in pounds; and,

Emissions Unit ID: **K013**

- f. in conjunction with the daily recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all coating materials employed, (summation of e for each day to date from January 1<sup>st</sup> to December 31<sup>st</sup>).
2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds; and,
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds.
3. The permittee shall calculate and record the following information each month from emissions units P001-P004, R001-R012, K001-K013:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total emissions of OC from each cleanup material employed (b x c), in pounds;
  - e. the total emissions of OC from all cleanup materials employed (summation of d), in pounds; and,
  - f. in conjunction with the monthly recordkeeping above the permittee shall calculate and record the annual, year to date OC emissions from all cleanup materials employed, (summation of e for each calendar month to date from January to December).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust

parameters, etc.); and,

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**IV. Reporting Requirements**

- 1. The permittee shall submit annual reports that summarize the actual annual OC emissions from coatings operations from emissions units K001-K013. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall submit annual reports that summarize the actual annual OC emissions from cleanup operations from emissions units P001-P004, R001-R012, K001-K013.. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation from cleanup operations for this emissions unit. The reports shall be submitted in accordance with section A.2 of the General Terms and Conditions of this permit.

**V. Testing Requirements**

- 1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

59.2 lbs OC/day

Applicable Compliance Method:

The lbs/day limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons by a maximum coating OC content of 5.92 lbs/gallon. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the daily OC limitation.

- b. Emission Limitation:

10.8 tons OC/yr

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the maximum gallons per day coating usage restriction of 10 gallons, maximum coating OC content of 5.92 lbs/gallon , and a maximum operating schedule of 365 days/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily gallons usage limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

25 tons OC/yr grouped allowable from emissions units K001-K013

Applicable Compliance Method:

Compliance with the grouped annual emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

d. Emission Limitation:

2 tons OC/month

Applicable Compliance Method:

Compliance with the tons/month emission limitation shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

e. Emission Limitation:

Emissions Unit ID: **K013**

17.03 tons OC/yr from clean up operations from emissions units P001-P004, R001-R012 and K001-K013

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section B.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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

None.