



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

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

CERTIFIED MAIL

Application No: 13-03725

DATE: 4/3/2001

Sherwin Williams Automotive
Dennis Crankshaw
4440 Warrensville Center Road
Warrensville Hts, OH 44128-0000

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1600** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA

CBAPC

PA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 13-03725

Application Number: 13-03725
APS Premise Number: 1318596095
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sherwin Williams Automotive
Person to Contact: Dennis Crankshaw
Address: 4440 Warrensville Center Road
Warrensville Hts, OH 44128-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4440 Warrensville Center Road
Warrensville Hts, Ohio**

Description of proposed emissions unit(s):
Eight R & D application spray booths for testing automotive coatings on various automotive substrates.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

Sherwin Williams Automotive

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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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

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	58.4
single HAP	< 10
all HAPs	< 25

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-21-07 (G)(2)	See A.2.a. 8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

Emissions Unit ID: **K001**

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.
 - a. The company identification for each cleanup material employed on any day only metal parts are coated.

- b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

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Emissions Unit ID: **K001**

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A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Pollutant: Methyl isobutyl ketone

TLV (mg/m³): 205

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Emissions Unit ID: **K001**

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

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Emissions Unit ID: **K001**

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1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-21-07 (G)(2)	See A.2.a. 8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

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- a. The company identification for each cleanup material employed on any day only metal parts are coated.
 - b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total

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Emissions Unit ID: **K002**

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HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Pollutant: Methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 5,548

Pollutant: N-butyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,476

Pollutant: V M & P Naptha

TLV (mg/m³): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 33,310

Sher

PTI

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Pollutant: Xylene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

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PTI

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

Sherwin Williams Automotive
PTI Application 13-02725
Issue

Facility ID: 1318596095

Emissions Unit ID: **K002**

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4, D, and E.

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-21-07 (G)(2)	See A.2.a. 8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

Sher

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Issued: To be entered upon final issuance

Emissions Unit ID: **K003**

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.

Issued: To be entered upon final issuance

- a. The company identification for each cleanup material employed on any day only metal parts are coated.
 - b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total

Emissions Unit ID: **K003**

HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Sher

PTI

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

Pollutant: Methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 5,548

Pollutant: N-butyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,476

Pollutant: V M & P Naptha

TLV (mg/m³): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 33,310

Pollutant: Xylene

TLV (mg/m3): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

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PTI

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-31-05 (D)	See A.2.a.
	OAC rule 3745-21-07 (G)(2)	8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.
 - a. The company identification for each cleanup material employed on any day only metal

- parts are coated.
- b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

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PTI

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 5,548

Pollutant: N-butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 16,976

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 4,476

Pollutant: V M & P Naptha

TLV (mg/m3): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 33,310

Pollutant: Xylene

TLV (mg/m3): 435

Sher

PTI

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

Issued: To be entered upon final issuance

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

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PTI

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-21-07 (G)(2)	See A.2.a. 8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

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PTI /

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.
 - a. The company identification for each cleanup material employed on any day only metal

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- parts are coated.
 - b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP

emissions for the current calendar month].

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Pollutant: Methyl isobutyl ketone

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PTI

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 5,548

Pollutant: N-butyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,476

Pollutant: V M & P Naptha

TLV (mg/m³): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 33,310

Pollutant: Xylene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

Sher

PTI

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

E. Testing Requirements

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

Sherwin Williams Automotive
PTI Application 13-02725
Issue

Facility ID: 1318596095

Emissions Unit ID: K005

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-31-05 (D)	See A.2.a.
	OAC rule 3745-21-07 (G)(2)	8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

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PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K006**

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.

- a. The company identification for each cleanup material employed on any day only metal parts are coated.
 - b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP

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Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

emissions for the current calendar month].

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 5,548

Pollutant: N-butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 16,976

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 4,476

Pollutant: V M & P Naptha

TLV (mg/m3): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 33,310

Pollutant: Xylene

Sher

PTI

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

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Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-21-07 (G)(2)	See A.2.a. 8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.
 - a. The company identification for each cleanup material employed on any day only metal

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- parts are coated.
 - b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP

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Emissions Unit ID: **K007**

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emissions for the current calendar month].

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 5,548

Pollutant: N-butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 16,976

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 4,476

Pollutant: V M & P Naptha

TLV (mg/m3): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 33,310

Pollutant: Xylene

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Emissions Unit ID: **K007**

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TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

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Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

Sherwin Williams Automotive
PTI Application 13-02725
Issue

Facility ID: 1318596095

Emissions Unit ID: **K007**

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray booth for coating metal and non-metal test parts.	OAC rule 3745-31-05 (A)(3)	7.3 tpy OC, including cleanup, on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2), OAC rule 3745-21-09 (U)(2)(e)(ii), and OAC rule 3745-31-05 (D)
	OAC rule 3745-21-07 (G)(2)	See A.2.a. 8 lbs/hr and 40 lbs/day of organic compounds (OC) on any day non-metal parts are coated or any day a combination of metal and non-metal parts are coated, including clean-up.
	OAC rule 3745-21-09 (U)(2)(e)(ii)	Use not more than 3 gallons of coatings per day on any day in which only metal parts are coated.

2. Additional Terms and Conditions

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Emissions Unit ID: **K008**

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall be less than 10 tpy as a rolling, twelve-month summation for any single HAP and 25 tpy as a rolling, twelve-month summation for the combination of all HAPs.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information any day non-metal parts are coated.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup up material employed, in pounds per gallon, as applied.
 - d. The total daily OC emissions for all coatings and clean up materials employed [summation of (b x c) for all coatings], as applied.
 - e. The total hours of operation.
 - f. The total average hourly OC emissions (e / f).
2. The permittee shall collect and record the following information for this emissions unit on any day only metal parts are coated.
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
3. To determine annual emissions, each month the permittee shall collect and record the following information for this emission unit.

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Emissions Unit ID: **K008**

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- a. The company identification for each cleanup material employed on any day only metal parts are coated.
 - b. The organic compound content of each coating and cleanup material employed on any day only metal parts are coated.
 - c. The number of gallons of each coating and cleanup material employed on any day only metal parts are coated.
 - d. The total organic compound emissions on any day only metal parts are coated (i.e., b x c).
 - e. Total organic compound emissions from the days only metal parts are coated (C.3.d).
 - f. Total organic compound emissions from the days any non-metal parts are coated (C.1.d).
 - g. Total organic compound emissions (C.3.e. + C.1.f.).
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007 and K008:
- a. The company name and identification number of each coating employed.
 - b. The organic HAP content for each individual HAP of each coating employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of c x b) for each individual HAP for all the coatings].
 - e. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - f. The total HAP emissions, in pounds, for all the coatings employed [summation of (e) for all the HAPs].
 - g. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total

Emissions Unit ID: **K008**

HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Bureau Air Pollution Control contact. This information does not have to be kept on a line-by-line basis.

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

Pollutant: Ethylbenzene

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 concentration at the property line at 114 meters, for emission unit: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 10,357

Pollutant: Isobutyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 14,048

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Emissions Unit ID: **K008**

Issued: To be entered upon final issuance

Pollutant: Methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,881

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 5,548

Pollutant: N-butyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 16,976

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 4,476

Pollutant: V M & P Naptha

TLV (mg/m³): 1399

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m³): 33,310

Pollutant: Xylene

TLV (mg/m3): 435

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3695 (concentration at the property line at 114 meters, for emission units: K001, K002, K003, K004, K005, K006, K007 and K008)

MAGLC (ug/m3): 10,357

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-

Issued: To be entered upon final issuance

01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for a single HAP.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 12-month emission limitation for an aggregate of two or more HAPs.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily usage of coatings.
7. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation - 8 lbs of OC/hr (for the coatings used for metal and non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

- b. Emission Limitation - 40 lbs of OC/day on any day only non-metal parts are coated.

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.1. of the terms and conditions of this permit.

- c. Emission Limitation - 7.3 tpy of OC .

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in sections C.1. and C.3. of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from all days in which any non-metal parts are coated for the previous calendar year (i.e., C.3.f.).

- d. Usage Restriction - 3 gallons/day (for any day metal parts are coated.)

Applicable Compliance Method -

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2. of the terms and conditions of this permit.

- e. Emission Limitation - 25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -

Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.4. of the terms and conditions of this permit.

F. Miscellaneous Requirements

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PTI

Emissions Unit ID: **K008**

Issued: To be entered upon final issuance

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A, B, C.1- 4., D, and E.

NEW SOURCE REVIEW FORM B

PTI Number: 13-03725 Facility ID: 1318596095

FACILITY NAME Sherwin Williams Automotive

FACILITY DESCRIPTION Eight R & D application sprav booths for CITY/TWP Warrensville Hts

Emissions Unit ID: **K008**

SIC CODE 8731 SCC CODE 4-02-016-21 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Spray booth for testing automotive coatings.

DATE INSTALLED 8/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		0.36 lbs/hr	0.37	8 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination Compliance with the terms/conditions and rules/regulations of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ethylbenzene, Isobutyl Acetate, Methyl ethyl ketone, Methyl isobutyl ketone, Methyl n-amyl ketone, N-butyl acetate, Toluene, V M & P Naptha, Xylene

NEW SOURCE REVIEW FORM B

PTI Number: 13-03725 Facility ID: 1318596095

FACILITY NAME Sherwin Williams Automotive

FACILITY DESCRIPTION Eight R & D application sprav booths for CITY/TWP Warrensville Hts

Emissions Unit ID: **K008**

SIC CODE 8731 SCC CODE 4-02-016-21 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Spray booth for testing automotive coatings.

DATE INSTALLED 9/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		0.36 lbs/hr	0.37	8.0 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the terms/conditions and rules/regulations of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ethylbenzene, Isobutyl Acetate, Methyl ethyl ketone, Methyl isobutyl ketone, Methyl n-amyl ketone, N-butyl acetate, Toluene, V M & P Naptha, Xylene

NEW SC

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FACILITY

Emissions Unit ID: **K008**

FACILITY DESCRIPTION Eight R & D application spray booths for testing automotive coatings on various automotive substrates.

CITY/TWP Warrensville Hts

SIC CODE 8731 SCC CODE 4-02-016-21 EMISSIONS UNIT ID K006

EMISSIONS UNIT DESCRIPTION Spray paint booth for testing automotive coatings.

DATE INSTALLED 9/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		0.36 lbs/hr	0.37	8.0 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with terms/conditions and rules /regulations of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ethylbenzene, Isobutyl Acetate, Methyl ethyl ketone, Methyl isobutyl ketone, Methyl n-amyl ketone, N-butyl acetate, Toluene, V M & P Naptha, Xylene

NEW SOURCE REVIEW FORM B

PTI Number: 13-03725 Facility ID: 1318596095

FACILITY NAME Sherwin Williams Automotive

FACILITY DESCRIPTION Eight R & D application sprav booths for CITY/TWP Warrensville Hts

Emissions Unit ID: **K008**

SIC CODE 8731 SCC CODE 4-02-016-21 EMISSIONS UNIT ID K007

EMISSIONS UNIT DESCRIPTION Spray paint booth for testing automotive coatings.

DATE INSTALLED 9/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		0.36 lbs/hr	0.37	8.0 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the terms/conditions and rules/regulations of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ethylbenzene, Isobutyl Acetate, Methyl ethyl ketone, Methyl isobutyl ketone, Methyl n-amyl ketone, N-butyl acetate, Toluene, V M & P Naptha, Xylene

8 NEW SOURCE REVIEW FORM B

PTI Number: 13-03725

Facility ID: 1318596095

FACILITY NAME Sherwin Williams Automotive

FACILITY DESCRIPTION Eight R & D application spray booths for CITY/TWP Warrensville Hts

Emissions Unit ID: **K008**

SIC CODE 8731

SCC CODE 4-02-106-21

EMISSIONS UNIT ID K008

EMISSIONS UNIT DESCRIPTION Spray paint booth for testing automotive coatings.

DATE INSTALLED 9/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		0.36 lbs/hr	0.37	8.0 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the terms/conditions and rules/regulations of this permit.IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ethylbenzene, Isobutyl Acetate, Methyl ethyl ketone, Methyl isobutyl ketone, Methyl n-amyl ketone, N-butyl acetate, Toluene, V M & P Naptha, Xylene