



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 15-01581

Fac ID: 1576051608

DATE: 6/9/2005

Hendrickson Trailer Suspension Systems
Frank Hezoucky
2070 Industrial Place SE
Canton, OH 44707-2600

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

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

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

Canton LAA



**Permit To Install
Terms and Conditions**

**Issue Date: 6/9/2005
Effective Date: 6/9/2005**

FINAL PERMIT TO INSTALL 15-01581

Application Number: 15-01581
Facility ID: 1576051608
Permit Fee: **\$800**
Name of Facility: Hendrickson Trailer Suspension Systems
Person to Contact: Frank Hezoucky
Address: 2070 Industrial Place SE
Canton, OH 44707-2600

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2070 Industrial Place SE
Canton, Ohio**

Description of proposed emissions unit(s):
Installation of two(2) new paint booths; K004 and K005.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

declared invalid.

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

Hendrickson Trailer Suspension Systems

PTI Application: 15-01581

Issued: 6/9/2005

Facility ID: 1576051608

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

Hendrickson Trailer Suspension Systems

Facility ID: 1576051608

PTI Application: 15-01581

Issued: 6/9/2005

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	39
HAPs(individual)	4.8
HAPs(Total)	12.0
PM	4.8

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Hendrickson Trailer Suspension Systems

PTI Application: 15-01581

Issued: 6/9/2005

Facility ID: 1576051608

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Hendr

PTI A

Issued: 6/9/2005

Emissions Unit ID: K003

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Paint spray booth with fiberglass filters for painting suspension components. This emissions unit was previously permitted under PTI 15-1299. This is a Chapter 31 modification which will allow the use of more automated spray equipment and is a synthetic minor permit.	OAC 3745-31-05(A)(3)	2.41 tpy particulates 22.1 lbs/hr VOC (See A.2.b)
	OAC 3745-17-07	See A.2.a below.
	OAC 3745-17-11	0.551 lb/hr particulates
	OAC 3745-21-09; including but not limited to 3745-21-09 (U) (1) (c)	3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
	OAC 3745-35-07(B)	32 tons VOC per rolling 365-day period; 2.4 tons Single HAP per rolling 365-day period; 6.0 tons Total HAPS per rolling 365-day period The annual VOC emissions rate includes VOC generated from clean-up materials and coatings. Coating and cleanup solvent usage restrictions - see Section II below. See section A.2.c

2. Additional Terms and Conditions

- 2.a** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b** This limitation was established using the maximum coating content and usage.
- 2.c** This newly modified PTI, application no. 15-01581, is also a chapter 31 synthetic minor modification to PTI 15-01404. This modification is requested by the company to provide plant wide VOC emissions flexibility after the addition of two new emission units, paint booths K003 and K004, while maintaining VOC and HAP emissions beneath Title V, MACT, and NSR thresholds in a VOC non-attainment area. Emission units K003 and K004 are permitted in PTI 15-01581.

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 17,500 gallons, based upon a rolling, 365-day summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage figures.

2. The maximum annual cleanup usage for this emissions unit shall not exceed 357 gallons, based upon a rolling, 365-day summation of the cleanup usage figures.
3. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for VOC emissions:

$$B_1 + B_2 + \dots + B_n = 17,500 \text{ gallons of coating per rolling, 365-day period;}$$

$$D_1 + D_2 + \dots + D_n = 357 \text{ gallons of cleanup evaporated per rolling, 365-day period; and}$$

$$(A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

$$= 32 \text{ tons of VOC per rolling, 365-day period}$$

where:

- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of VOC per volume of each different coating, as applied, in units of pounds VOC per gallon;
- B_n = Volume of each different coating, as applied, in units of gallons per year;
- C_n = Mass of VOC per volume of each different cleanup, as applied, in units of pounds VOC per gallon; and
- D_n = Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

4. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for any Single HAP emission:

$$B_1 + B_2 + \dots + B_n = 17,500 \text{ gallons of coating per rolling, 365-day period;}$$

$$D_1 + D_2 + \dots + D_n = 357 \text{ gallons of cleanup evaporated per rolling, 365-day period; and}$$

$$(A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

$$= 2.4 \text{ tons of any Single HAP per rolling, 365-day period}$$

where:

- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of Single HAP per volume of each different coating, as applied, in units of pounds Single HAP per gallon;
- B_n = Volume of each different coating, as applied, in units of gallons per year;
- C_n = Mass of Single HAP per volume of each different cleanup, as applied, in units of pounds Single HAP per gallon; and
- D_n = Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

5. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for Total HAP emissions:

$$B_1 + B_2 + \dots + B_n = 17,500 \text{ gallons of coating per rolling, 365-day period;}$$

$D_1 + D_2 + \dots + D_n = 357$ gallons of cleanup evaporated per rolling, 365-day period; and

$(A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$

= 6.0 tons of Total HAPs per rolling, 365-day period

where:

- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of Total HAPs per volume of each different coating, as applied, in units of pounds Total HAPs per gallon;
- B_n = Volume of each different coating, as applied, in units of gallons per year;
- C_n = Mass of Total HAPs per volume of each different cleanup, as applied, in units of pounds Total HAPs per gallon; and
- D_n = Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information:
 - a. the coating and cleanup usage rates (in gallons/day) for each day; and
 - b. beginning after the first 12 calendar months of operation after issuance of this permit, the rolling, 365-day summation of the coating and cleanup usage figures.

Also, during the first 12 calendar months of operation after issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the VOC emissions from all coatings employed, in pounds per day;

- e. the name and identification of the cleanup solvent employed;
 - f. the VOC content of the cleanup solvent, in weight percent VOC;
 - g. the amount (in gallons) of cleanup solvent(s) used, the amount recycled, and the difference between the amount used and the amount recycled (which is the amount emitted);
 - h. the VOC emissions from all cleanup materials employed based on the result of A.III.2.g above, in pounds per day; and
 - i. the total combined rolling, 365-day summation of VOC emissions from both coatings and cleanup materials employed (sum of A.III.2.d and A.III.2.h above), in pounds per year and tons per year.
3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. the total HAP content for each HAP of each coating in pounds of total HAPS per gallon of coating, as applied (sum of all the individual HAP contents from A.III.3.b above);
 - d. the amount (in gallons) of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total HAP content of each cleanup material in pounds of total HAPs per gallon of cleanup material, as applied (sum of all the individual HAP contents from A.III.3.f above);
 - h. the amount (in gallons) of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds per day (for each HAP, the sum of A.III.3.b times A.III.3.d for each coating and the sum of A.III.3.f times A.III.3.h for each cleanup material);

- j. the total HAP emissions from all coatings and cleanup materials employed, in pounds per day (the sum of A.III.3.c times A.III.3.d for each coating plus the sum of A.III.3.g times A.III.3.h for each cleanup material);
 - k. the total combined rolling, 365-day summation of each individual HAP emission from both coatings and cleanup materials employed, in pounds per year and tons per year; and
 - l. the total combined rolling, 365-day summation of Total HAP emissions from both coatings and cleanup materials employed, in pounds per year and tons per year.
4. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions

IV. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of the use of noncomplying coatings. A noncomplying coating contains more than 3.50 pounds of VOC per gallon of coating excluding water and exempt solvents as applied. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 30 days following the end of the calendar month in which the deviation occurred.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels identified in Section A.1 for each month. The deviation report shall be submitted within 45 days after the exceedance occurred.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day cleanup usage limitation. The deviation report shall be submitted within 45 days

after the exceedance occurred.

4. The permittee shall submit an annual report which specifies the VOC emissions (in pounds and tons) from the coating operations, the VOC emissions from the use of cleanup solvent, and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit an annual report which specifies the individual HAP and total HAP emissions (in pounds and tons) from the coating operations and the individual HAP and total HAP emissions from the use of cleanup solvent for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit semiannual written reports which:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the permit allowable mass emissions and/or control usage requirements in the air emission summary of this permit to install shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method

If required, compliance shall be determined by performing visible emissions observations using Method 9 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation

Emissions Unit ID: K003

0.551 lb/hr particulate

Applicable Compliance Method

If required, compliance shall be determined by performing a stack test using Method 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation

2.41 tpy particulates

Applicable Compliance Method

The ton per year limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly particulate limitation, compliance will also be shown with the annual limitation.

d. Emission Limitation

3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied

Applicable Compliance Method

Compliance shall be performed in accordance with OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation

32 tons VOC per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total VOC's emitted per rolling 365-day period from coating and cleanup operations combined as follows:

$$\text{VOC} = (A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

where:

- VOC = Total VOC emissions from coating operations in units of tons of VOC per year;
- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of VOC per volume of coating, as applied, in units of pounds VOC per gallon;
- B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
- C_n = Mass of VOC per volume of cleanup, as applied, in units of pounds VOC per gallon;
- D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

f. Emission Limitation

2.4 tons of any single HAP per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total Single HAP emitted per rolling 365-day period from coating and cleanup operations as follows:

$$\text{S-HAP} = (A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

where:

S-HAP = Total for any given Single HAP emissions from coating and cleanup operation in units of tons of Single HAP per year;

n = Number of either the different coatings or cleanup materials applied in this emissions unit;

A_n = Mass of Single HAP per volume of coating as applied, in units of pounds Single HAP per gallon; and

B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;

C_n = Mass of Single HAP per volume of cleanup, as applied, in units of pounds Single HAP per gallon; and

D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

g. Emission Limitation

6.0 tons of Total HAPS per rolling, 365-day period from coating and cleanup operations

Applicable Compliance Method

Calculate the total HAPS emitted per rolling, 365-day period from coating operations

$$\text{T-HAPS} = (A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

where:

T-HAPS = Total HAPS emissions from coating operations in units of tons of HAPS per year;
 n = Number of either the different coatings or cleanup materials applied in this emissions unit;
 A_n = Mass of Total HAPS per volume of coating as applied, in units of pounds Total HAPS per gallon;
 B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
 C_n = Mass of Total HAPS per volume of cleanup, as applied, in units of pounds Total HAPS per gallon; and
 D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

h. Coating Usage Limitation

The maximum annual coating usage for this emissions unit shall not exceed 17,500 gallons, based upon a rolling, 365-day summation of the coating usage figures, and the usage restrictions contained in Sections B.3, B.4, and B.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections A.III and A.IV of this permit.

i. Cleanup Usage Limitation

The maximum annual cleanup usage for this emissions unit shall not exceed 357 gallons (with a 50% recovery rate, i.e. assume 714.5 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures, and the usage restrictions contained in Sections A.II.3, A.II.4, and A.II.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections A.III and A.IV of this permit.

VI. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. The emissions unit was evaluated based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "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).

- a. The following summarizes the results of the modeling for each pollutant due to coating usage:

Pollutant: VM&P Naptha

TLV ($\mu\text{g}/\text{m}^3$): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 13.11

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1100

MAGLC ($\mu\text{g}/\text{m}^3$): 32,619

Pollutant: toluene

TLV ($\mu\text{g}/\text{m}^3$): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 143

MAGLC ($\mu\text{g}/\text{m}^3$): 4,476

Pollutant: butyl acetate

TLV ($\mu\text{g}/\text{m}^3$): 713

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 81

MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: methyl propyl ketone

TLV ($\mu\text{g}/\text{m}^3$): 705

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.89

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 75

MAGLC ($\mu\text{g}/\text{m}^3$): 16,786

- b. The following summarizes the results of the modeling for each pollutant due to cleanup usage:

Pollutant: toluene

TLV ($\mu\text{g}/\text{m}^3$): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 24.1

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 2023

MAGLC ($\mu\text{g}/\text{m}^3$): 4476

Pollutant: VM&P Naptha

TLV ($\mu\text{g}/\text{m}^3$): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 16.85

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1414

MAGLC ($\mu\text{g}/\text{m}^3$): 32,619

Pollutant: acetone

TLV ($\mu\text{g}/\text{m}^3$): 1780

Maximum Hourly Modeled Emission Rate (lbs/hr): 14.45

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1213

MAGLC ($\mu\text{g}/\text{m}^3$): 42,381

Hendrickson Trailer Suspension Systems

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Pollutant: isopropyl alcohol

TLV ($\mu\text{g}/\text{m}^3$): 983

Maximum Hourly Modeled Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 609MAGLC ($\mu\text{g}/\text{m}^3$): 23,405

Pollutant: methyl ethyl ketone

TLV ($\mu\text{g}/\text{m}^3$): 590

Maximum Hourly Modeled Emission Rate (lbs/hr): 4.85

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 407MAGLC ($\mu\text{g}/\text{m}^3$): 14,048

Pollutant: xylene

TLV ($\mu\text{g}/\text{m}^3$): 434

Maximum Hourly Modeled Emission Rate (lbs/hr): 2.4

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 201MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

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.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Paint spray booth with fiberglass filters for painting suspension components. This emissions unit was previously permitted under PTI 15-1299. This is a Chapter 31 modification which will allow the use of more automated spray equipment and is a synthetic minor permit.	OAC rule 3745-31-05(A)(3)	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

Hendrickson Trailer Suspension Systems

PTI Application: 15 01501

Issued

Facility ID: 1576051608

Emissions Unit ID: K003

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Paint spray booth with fiberglass filters for painting suspension components. This emissions unit was previously permitted under PTI 15-1299. This is a Chapter 31 modification which will allow the use of more automated spray equipment and is a synthetic minor permit.	OAC 3745-31-05(A)(3) OAC 3745-17-07 OAC 3745-17-11 OAC 3745-21-09; including but not limited to 3745-21-09 (U) (1) (c) OAC 3745-35-07(B)	2.41 tpy particulates 22.1 lbs/hr VOC (See A.2.b) See A.2.a below. 0.551 lb/hr particulates 3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied. 7.0 tons VOC per rolling 365-day period; 2.4 tons Single HAP per rolling 365-day period; 6.0 tons Total HAPS per rolling 365-day period The annual VOC emissions rate includes VOC generated from clean-up materials and coatings. Coating and cleanup solvent usage restrictions - see Section II below.

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Hendr

PTI A

Issued: 6/9/2005

See section A.2.c

Emissions Unit ID: K004

2. Additional Terms and Conditions

- 2.a** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b** This limitation was established using the maximum coating content and usage.
- 2.c** This newly modified PTI, application no. 15-01581, is also a chapter 31 synthetic minor modification to PTI 15-01404. This modification is requested by the company to provide plant wide VOC emissions flexibility after the addition of two new emission units, paint booths K003 and K004, while maintaining VOC and HAP emissions beneath Title V, MACT, and NSR thresholds in a VOC non-attainment area. Emission units K003 and K004 are permitted in PTI 15-01581.

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 3600 gallons, based upon a rolling, 365-day summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage figures.

2. The maximum annual cleanup usage for this emissions unit shall not exceed 179 gallons (with a 50% recovery rate, i.e. assume 714.5 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures.
3. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for VOC emissions:

$$B_1 + B_2 + \dots + B_n = 3600 \text{ gallons of coating per rolling, 365-day period;}$$

$$D_1 + D_2 + \dots + D_n = 179 \text{ gallons of cleanup evaporated per rolling, 365-day period; and}$$

$$(A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

$$= 7.0 \text{ tons of VOC per rolling, 365-day period}$$

where:

- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of VOC per volume of each different coating, as applied, in units of pounds VOC per gallon;
- B_n = Volume of each different coating, as applied, in units of gallons per year;
- C_n = Mass of VOC per volume of each different cleanup, as applied, in units of pounds VOC per gallon; and
- D_n = Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

4. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for any Single HAP emission:

$$B_1 + B_2 + \dots + B_n = 3600 \text{ gallons of coating per rolling, 365-day period;}$$

$$D_1 + D_2 + \dots + D_n = 179 \text{ gallons of cleanup evaporated per rolling, 365-day period; and}$$

$$(A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

$$= 2.4 \text{ tons of any Single HAP per rolling, 365-day period}$$

where:

- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of Single HAP per volume of each different coating, as applied, in units of pounds Single HAP per gallon;
- B_n = Volume of each different coating, as applied, in units of gallons per year;
- C_n = Mass of Single HAP per volume of each different cleanup, as applied, in units of pounds Single HAP per gallon; and
- D_n = Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

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5. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for Total HAP emissions:

$$B_1 + B_2 + \dots + B_n = 3,600 \text{ gallons of coating per rolling, 365-day period;}$$

$$D_1 + D_2 + \dots + D_n = 179 \text{ gallons of cleanup evaporated per rolling, 365-day period; and}$$

$$(A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

$$= 6.0 \text{ tons of Total HAPs per rolling, 365-day period}$$

where:

- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of Total HAPs per volume of each different coating, as applied, in units of pounds Total HAPs per gallon;
- B_n = Volume of each different coating, as applied, in units of gallons per year;
- C_n = Mass of Total HAPs per volume of each different cleanup, as applied, in units of pounds Total HAPs per gallon; and
- D_n = Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information:
 - a. the coating and cleanup usage rates (in gallons/day) for each day; and
 - b. beginning after the first 12 calendar months of operation after issuance of this permit, the rolling, 365-day summation of the coating and cleanup usage figures.

Also, during the first 12 calendar months of operation after issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the number of gallons of each coating employed;

- d. the VOC emissions from all coatings employed, in pounds per day;
 - e. the name and identification of the cleanup solvent employed;
 - f. the VOC content of the cleanup solvent, in weight percent VOC;
 - g. the amount (in gallons) of cleanup solvent(s) used, the amount recycled, and the difference between the amount used and the amount recycled (which is the amount emitted);
 - h. the VOC emissions from all cleanup materials employed based on the result of A.III.2.g above, in pounds per day; and
 - i. the total combined rolling, 365-day summation of VOC emissions from both coatings and cleanup materials employed (sum of A.III.2.d and A.III.2.h above), in pounds per year and tons per year.
3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. the total HAP content for each HAP of each coating in pounds of total HAPS per gallon of coating, as applied (sum of all the individual HAP contents from C.3.b above);
 - d. the amount (in gallons) of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total HAP content of each cleanup material in pounds of total HAPs per gallon of cleanup material, as applied (sum of all the individual HAP contents from A.III.3.f above);
 - h. the amount (in gallons) of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds per day (for each HAP, the sum of A.III.3.b times A.III.3.d for each

Emissions Unit ID: K004

- coating and the sum of A.III.3.f times A.III.3.h for each cleanup material);
- j. the total HAP emissions from all coatings and cleanup materials employed, in pounds per day (the sum of A.III.3.c times A.III.3.d for each coating plus the sum of A.III.3.g times A.III.3.h for each cleanup material);
 - k. the total combined rolling, 365-day summation of each individual HAP emission from both coatings and cleanup materials employed, in pounds per year and tons per year; and
 - l. the total combined rolling, 365-day summation of Total HAP emissions from both coatings and cleanup materials employed, in pounds per year and tons per year.
4. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions

IV. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of the use of noncomplying coatings. A noncomplying coating contains more than 3.50 pounds of VOC per gallon of coating excluding water and exempt solvents as applied. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 30 days following the end of the calendar month in which the deviation occurred.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels identified in Section A.1 for each month. The deviation report shall be submitted within 45 days after the exceedance occurred.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

rolling, 365-day cleanup usage limitation. The deviation report shall be submitted within 45 days after the exceedance occurred.

4. The permittee shall submit an annual report which specifies the VOC emissions (in pounds and tons) from the coating operations, the VOC emissions from the use of cleanup solvent, and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit an annual report which specifies the individual HAP and total HAP emissions (in pounds and tons) from the coating operations and the individual HAP and total HAP emissions from the use of cleanup solvent for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit semiannual written reports which:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the permit allowable mass emissions and/or control usage requirements in the air emission summary of this permit to install shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method

If required, compliance shall be determined by performing visible emissions observations using Method 9 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation

0.551 lb/hr particulate

Applicable Compliance Method

If required, compliance shall be determined by performing a stack test using Method 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation

2.41 tpy particulates

Applicable Compliance Method

The ton per year limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly particulate limitation, compliance will also be shown with the annual limitation.

d. Emission Limitation

3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied

Applicable Compliance Method

Compliance shall be performed in accordance with OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation

7.0 tons VOC per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total VOC's emitted per rolling 365-day period from coating and cleanup operations combined as follows:

$$\text{VOC} = (A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

where:

- VOC = Total VOC emissions from coating operations in units of tons of VOC per year;
- n = Number of either the different coatings or cleanup materials applied in this emissions unit;
- A_n = Mass of VOC per volume of coating, as applied, in units of pounds VOC per gallon;
- B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
- C_n = Mass of VOC per volume of cleanup, as applied, in units of pounds VOC per gallon;
- D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

f. Emission Limitation

2.4 tons of any single HAP per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total Single HAP emitted per rolling 365-day period from coating and cleanup operations as follows:

$$\text{S-HAP} = (A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

where:

S-HAP	=	Total for any given Single HAP emissions from coating and cleanup operation in units of tons of Single HAP per year;
n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A _n	=	Mass of Single HAP per volume of coating as applied, in units of pounds Single HAP per gallon; and
B _n	=	Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C _n	=	Mass of Single HAP per volume of cleanup, as applied, in units of pounds Single HAP per gallon; and
D _n	=	Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

g. Emission Limitation

6.0 tons of Total HAPS per rolling, 365-day period from coating and cleanup operations

Applicable Compliance Method

Calculate the total HAPS emitted per rolling, 365-day period from coating operations

$$\text{T-HAPS} = (A_1 B_1 + A_2 B_2 + \dots + A_n B_n) \times (1/2000) + (C_1 D_1 + C_2 D_2 + \dots + C_n D_n) \times (1/2000)$$

where:

T-HAPS = Total HAPS emissions from coating operations in units of tons of HAPS per year;
 n = Number of either the different coatings or cleanup materials applied in this emissions unit;
 A_n = Mass of Total HAPS per volume of coating as applied, in units of pounds Total HAPS per gallon;
 B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
 C_n = Mass of Total HAPS per volume of cleanup, as applied, in units of pounds Total HAPS per gallon; and
 D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

h. Coating Usage Limitation

The maximum annual coating usage for this emissions unit shall not exceed 3600 gallons, based upon a rolling, 365-day summation of the coating usage figures, and the usage restrictions contained in Sections A.II.3, A.II.4, and A.II.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections A.III and A.IV of this permit.

i. Cleanup Usage Limitation

The maximum annual cleanup usage for this emissions unit shall not exceed 179 gallons (with a 50% recovery rate, i.e. assume 358 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures, and the usage restrictions contained in Sections A.II.3, A.II.4, and A.II.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections A.III and A.IV of this permit.

VI. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. The emissions unit was evaluated based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "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).

- a. The following summarizes the results of the modeling for each pollutant due to coating usage:

Pollutant: VM&P Naptha

TLV ($\mu\text{g}/\text{m}^3$): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 13.11

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1100

MAGLC ($\mu\text{g}/\text{m}^3$): 32,619

Pollutant: toluene

TLV ($\mu\text{g}/\text{m}^3$): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 143

MAGLC ($\mu\text{g}/\text{m}^3$): 4,476

Pollutant: butyl acetate

TLV ($\mu\text{g}/\text{m}^3$): 713

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 81

MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: methyl propyl ketone

TLV ($\mu\text{g}/\text{m}^3$): 705

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.89

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 75

MAGLC ($\mu\text{g}/\text{m}^3$): 16,786

- b. The following summarizes the results of the modeling for each pollutant due to cleanup usage:

Pollutant: toluene

TLV ($\mu\text{g}/\text{m}^3$): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 24.1

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 2023

MAGLC ($\mu\text{g}/\text{m}^3$): 4476

Pollutant: VM&P Naptha

TLV ($\mu\text{g}/\text{m}^3$): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 16.85

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1414

MAGLC ($\mu\text{g}/\text{m}^3$): 32,619

Pollutant: acetone

TLV ($\mu\text{g}/\text{m}^3$): 1780

Maximum Hourly Modeled Emission Rate (lbs/hr): 14.45

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1213

MAGLC ($\mu\text{g}/\text{m}^3$): 42,381

Pollutant: isopropyl alcohol

TLV ($\mu\text{g}/\text{m}^3$): 983

Maximum Hourly Modeled Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 609

MAGLC ($\mu\text{g}/\text{m}^3$): 23,405

Pollutant: methyl ethyl ketone

TLV ($\mu\text{g}/\text{m}^3$): 590

Maximum Hourly Modeled Emission Rate (lbs/hr): 4.85

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 407

MAGLC ($\mu\text{g}/\text{m}^3$): 14,048

Pollutant: xylene

TLV ($\mu\text{g}/\text{m}^3$): 434

Maximum Hourly Modeled Emission Rate (lbs/hr): 2.4

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 201

MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

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

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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.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Paint spray booth with fiberglass filters for painting suspension components. This emissions unit was previously permitted under PTI 15-1299. This is a Chapter 31 modification which will allow the use of more automated spray equipment and is a synthetic minor permit.	OAC rule 3745-31-05(A)(3)	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

Hendrickson Trailer Suspension Systems

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Issued

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None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None