State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
PORTAGE COUNTY

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: 16-02157

DATE: 2/12/2002

Streetsboro Plant Cleve Steel Container
Chuck Pankuch
10048 Aurora Hudson Rd
Streetsboro, OH 44241-1636

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

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

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

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

Very truly yours,

Thomas G. Rigo

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

CC: USEPA **ARAQMD**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 2/12/2002**
Terms and Conditions	**Effective Date: 2/12/2002**

FINAL PERMIT TO INSTALL 16-02157

Application Number:	16-02157
APS Premise Number:	1667080028
Permit Fee:	**$2200**
Name of Facility:	Streetsboro Plant Cleve Steel Container
Person to Contact:	Chuck Pankuch
Address:	10048 Aurora Hudson Rd Streetsboro, OH 44241-1636

Location of proposed air contaminant source(s) [emissions unit(s)]:
10048 Aurora Hudson Rd
Streetsboro, **Ohio**

Description of proposed emissions unit(s):
Creation of Facility Synthetic Minor T5 Strategy, Mod of PTIs 16-1405, 1573, 1698, 1576, 1818, 1923, 1983. Installation of K008.

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 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 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.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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

Pollutant	Tons Per Year
VOC	72.56
NOx	9.65
SOx	0.06
PM	5.66
CO	8.08
MEK	8.72
toluene	4.73
total HAPs	17.25

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Roll Coater paint Line (modification)	OAC rule 3745-31-05(A)(3)	See A.2.a through A.2.s, and B.1 through B.12 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-21-09(B)(6), 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-10(B)(1)	See A.2.t below.
	OAC rule 3745-21-09(B)(6)	See B.1 below.
	OAC rule 3745-21-09(U)(1)	See A.2.t and B.1 below.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.s, and B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.028 pound per hour, nor 0.12 ton per year.

2.b Volatile organic compound (VOC) emissions associated with the Roll Coating operations

shall not exceed 2.38 pound per hour, nor 10.4 tons per year.

2.c Volatile organic compound (VOC) emissions associated with the clean-up operations shall not exceed 11.07 pounds per week, nor 0.29 ton per year. All emissions from clean-up are methyl ethyl ketone (MEK), which is a hazardous air pollutant (single HAP).

2.d Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.50 pound per hour, nor 2.20 tons per year.

2.e Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.003 pound per hour, nor 0.01 ton per year.

2.f Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.038 pound per hour, nor 0.17 ton per year.

2.g Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.42 pound per hour, nor 1.84 tons per year.

2.h Formaldehyde emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

2.i Methanol emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.14 ton per year.

2.j Xylene emissions associated with painting operations shall not exceed 0.26 pound per hour, nor 1.12 tons per year.

2.k Methyl Isobutyl ketone (MIBK) emissions associated with painting operations shall not exceed 0.05 pound per hour, nor 0.20 ton per year.

2.l Ethyl benzene emissions associated with painting operations shall not exceed 0.05 pound per hour, nor 0.23 ton per year.

2.m Napthalene emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

2.n Toluene emissions associated with painting operations shall not exceed 0.55 pound per hour, nor 2.41 tons per year.

2.o Methyl ethyl ketone emissions associated with painting operations shall not exceed 0.95 pound per hour, nor 4.14 tons per year.

2.p Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.q Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.r Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.s In lieu of complying with the pounds of organic material (OC) per gallon of solids limitation contained in OAC rule 3745-21-09(U)(1), the permittee has chosen to employ a control device (regenerative thermal oxidizer) and will demonstrate that the capture and control efficiency provide not less than an eighty one percent reduction, by weight, in the overall OC emissions from the coating line and that the control device has a destruction efficiency of not less than ninety percent, by weight, for the OC emissions vented to the control device in accordance with OAC rule 3745-21-09(B)(6).

2.t The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. When either of emissions units K001 or K008, or both, are in operation, the permittee shall employ a regenerative thermal oxidizer (RTO) which shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

2. The modified Roll Coater booth shall be totally enclosed, with a 100% capture efficiency.

3. Paint usage on the Roll Coater shall be limited to 200 gallons per day.

4. The VOC content of the coatings used in the paint line shall be limited to 5.7 pounds per gallon.

5. The maximum amount of thinning is two parts coating to one part MEK.

6. The maximum density of the coatings used in the modified roll coater paint line as applied that are thinned shall be 9.70 pounds per gallon.

7. The maximum density of the coating used in the modified roll coater paint line as applied that is not thinned shall be 7.80 pounds per gallon.

8. The maximum amount of MEK used as clean-up solvent shall be 55 gallons per week. The minimum recovery rate from off-site hazardous waste disposal shall be 40%.

9. All clean-up shall be conducted inside the booth with the RTO in operation.

10. The modified Roll Coater shall use a natural gas fired dry-off oven to cure the parts. The oven's exhaust gases shall be connected to the RTO.

11. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

12. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

   The permittee shall collect and record the following information for each day for the control equipment:

   a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   b. All 3-hour blocks of time during which the average combustion temperature within the

thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

2. The permittee shall collect and record the following information each month for the purpose of determining rolling 12-month summation of emissions of VOC's and HAP's:

   a. The name and identification number of each coating, as applied.

   b. The VOC content of each coating, as applied, in pounds per gallon

   c. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

   d. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)].

   e. The number of gallons of each coating employed.

   f. The name and identification of each cleanup material employed.

   g. The number of gallons of each cleanup material employed.

   h. The VOC content of each cleanup material, in pounds per gallon.

   i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

   j. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)].

   k. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

   l. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (c) times (e) for each coating plus the sum of (i) times (g) for each cleanup material];

   m. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for each coating plus the sum of (j) times (g) for each cleanup material].

   n. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall

control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

o. The calculated, controlled individual hazardous air pollutant (single HAP) emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

p. The calculated, controlled total hazardous air pollutant (total HAP) emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall install, maintain and operate monitoring devices which measure the pressure inside and outside the permanent total enclosure. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

a. The difference in pressure between the permanent total enclosure and the surrounding area(s).

b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

4. 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: formaldehyde

TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 0.75

MAGLC (ug/m3): 8.77

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.).

5. 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 deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

2. The permittee shall submit quarterly summaries of the following records:

   a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

   c. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

   These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The permittee shall also submit annual reports which specify the total VOC, total individual HAP, and total combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

   a. Emission Limitation:

      Volatile organic compound emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.028 pounds per hour, nor 0.12 ton per year.

      Applicable Compliance Method:

      Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

      Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 5.5 pounds of VOC emitted per thousand cubic feet burned.

      To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

   b. Emission Limitation:

      Volatile organic compound emissions associated with the Roll Coating operations shall not exceed 2.38 pound per hour, nor 10.4 tons per year.

      Applicable Compliance Method:

      Multiply the maximum paint usage rate of 200 gallons per day by the maximum VOC content of the coatings used in the paint line, 5.7 pounds of VOC per gallon, then multiply by the conversion factor of 1 day per 24 hours. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

      To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

   c. Emission Limitation:

      Volatile organic compound emissions associated with the clean-up operations shall not

exceed 11.07 pounds per week, nor 0.29 ton per year. All emissions from clean-up are methyl ethyl ketone (MEK), which is a hazardous air pollutant (single HAP).

Applicable Compliance Method:

The maximum MEK usage rate for clean-up operations of 55 gallons per week is multiplied by the emission factor of 6.71 pounds per gallon. This weekly emission rate is reduced by a recovery rate of forty percent (multiply by a factor of 1 - 0.40), which is the weekly amount of MEK emitted prior to control. This emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per week limitation by 52 weeks per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.50 pound per hour, nor 2.20 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.003 pound per hour, nor 0.01 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

f. Emission Limitation:

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.038 pound per hour, nor 0.17 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

g. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.42 pound per hour, nor 1.84 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

h. Emission Limitation:

Formaldehyde emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (0.7% formaldehyde), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

i. Emission Limitation:

Methanol emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.14 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (0.8% methanol), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of

the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

j. Emission Limitation:

Xylene emissions associated with painting operations shall not exceed 0.26 pound per hour, nor 1.12 tons per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (7.9% xylene), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

k. Emission Limitation:

Methyl Isobutyl ketone (MIBK) emissions associated with painting operations shall not exceed 0.05 pound per hour, nor 0.20 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (1.4% MIBK), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

l. Emission Limitation:

Ethyl benzene emissions associated with painting operations shall not exceed 0.05 pound per hour, nor 0.23 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (1.6% ethyl benzene), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

m. Emission Limitation:

Napthalene emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (0.7% napthalene), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

n. Emission Limitation:

Toluene emissions associated with painting operations shall not exceed 0.55 pound per hour, nor 2.41 tons per year.

Applicable Compliance Method:

The maximum HAP concentration by weight (17.0% toluene), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 -

destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

o. Emission Limitation:

Methyl ethyl ketone emissions associated with painting operations shall not exceed 0.95 pound per hour, nor 4.14 tons per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (23.5% MEK), of the maximum painting rate of 8.3 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

p. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

q. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

r. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

2. Compliance with the operational restrictions shall be determined in accordance with the following methods:

a. Operational Restriction:

When either of emissions units K001 or K008, or both, are in operation, the permittee shall employ a regenerative thermal oxidizer which shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

ii. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

v. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

None.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - UN Hand Cover Line (modification)	OAC rule 3745-31-02(A)(2)	See A.2.a through A.2.k, B.1, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-17-11, 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-07(A)	See A.2.m below.
	OAC rule 3745-17-10(B)(1)	See A.2.l below.
	OAC rule 3745-17-11	See A.2.j below.
	OAC rule 3745-21-09(U)(1)	Zero pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.k below.

2. Additional Terms and Conditions

2.a Volatile organic compounds (VOC) emissions associated with the use of mineral spirits as clean up material shall not exceed 4.19 pounds per hour, nor 18.34 tons per year.

2.b Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 0.66 ton per year.

2.c Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.005 ton per year.

2.d Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

2.e Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 0.55 ton per year.

2.f Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

2.g Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.h Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.i Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.j Particulate matter (PM) emissions associated with blanking and forming covers from this emissions unit shall not exceed 0.551 pounds per hour, nor 2.41 ton per year.

2.k Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

2.l The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2.m The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2.n The hourly and yearly allowable ammonia emission limits are based on the emissions unit's potential to emit. Therefore, no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with these limitations.

B. Operational Restrictions

1. Natural gas shall be the only fuel used to fire the curing oven for this emissions unit.

2. Processing of cold rolled steel shall be limited to 2,250 pounds per hour.

3. No HAPs are emitted from this emissions unit. Therefore no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with the limitations in terms A.2.h. and A.2.i.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the quantity of mineral spirits used, in gallons.

2. The permit to install for this emissions unit (K003) 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: ammonia

   TLV (mg/m3): 17

   Maximum Hourly Emission Rate (lbs/hr): 0.73

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 104.1

   MAGLC (ug/m3): 404.76

   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.).

3. 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 notify the Director (the appropriate Ohio EPA District Office or local air

agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month in which the noncomplying coating was employed.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

   a. Emission Limitation:

      Volatile organic compounds (VOC) emissions associated with the use of mineral spirits as clean up material shall not exceed 4.19 pounds per hour, nor 18.34 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 2,250 pounds per hour by the conversion factor of 1 gallon of mineral spirits used per 3,600 pounds of production by the emission factor of 6.7 pounds of VOC emitted per gallon of mineral spirits.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 0.66 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton. Since emissions units K003 and K004 share an oven, divide this amount in half to obtain the allowable annual emission rate for each.

c. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.005 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which

is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton. Since emissions units K003 and K004 share an oven, divide this amount in half to obtain the allowable annual emission rate for each.

d. Emission Limitation:

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 0.55 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the

maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton. Since emissions units K003 and K004 share an oven, divide this amount in half to obtain the allowable annual emission rate for each.

f. Emission Limitation:

Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 145 pounds of coating per hour by the emission factor of 0.005 pound of VOC emitted per pound of coating (formulation data.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

g. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

h. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

i. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

j. Emission Limitation:

Particulate matter (PM) emissions associated with blanking and forming covers from this emissions unit shall not exceed 0.551 pounds per hour, nor 2.41 ton per year.

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(10).

k. Emission Limitation:

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K004 - Standard Hand Cover Line (modification)	OAC rule 3745-31-02(A)(2)	See A.2.a through A.2.k, B.1, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-17-11, 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-07(A)	See A.2.m below.
	OAC rule 3745-17-10(B)(1)	See A.2.l below.
	OAC rule 3745-17-11	See A.2.j below.
	OAC rule 3745-21-09(U)(1)	Zero pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.k below.

2. Additional Terms and Conditions

2.a Volatile organic compounds (VOC) emissions associated with the use of mineral spirits as clean up material shall not exceed 4.19 pounds per hour, nor 18.34 tons per year.

2.b Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 0.66 ton per year.

2.c Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.005 ton per year.

2.d Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

2.e Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 0.55 ton per year.

2.f Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

2.g Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.h Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.i Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.j Particulate matter (PM) emissions associated with blanking and forming covers from this emissions unit shall not exceed 0.551 pounds per hour, nor 2.41 ton per year.

2.k Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

2.l The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2.m The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2.n The hourly and yearly allowable ammonia emission limits are based on the emissions unit's potential to emit. Therefore, no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with these limitations.

B. Operational Restrictions

1. Natural gas shall be the only fuel used to fire the curing oven for this emissions unit.

2. Processing of cold rolled steel shall be limited to 2,250 pounds per hour.

3. No HAPs are emitted from this emissions unit. Therefore no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with the limitations in terms A.2.h. and A.2.i.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the quantity of mineral spirits used, in gallons.

2. The permit to install for this emissions unit (K004) 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: ammonia

   TLV (mg/m3): 17

   Maximum Hourly Emission Rate (lbs/hr): 0.73

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 104.1

   MAGLC (ug/m3): 404.76

   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.).

3. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month in which the noncomplying coating was employed.

E. Testing Requirements

Emissions Unit ID: **K004**

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compounds (VOC) emissions associated with the use of mineral spirits as clean up material shall not exceed 4.19 pounds per hour, nor 18.34 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 2,250 pounds per hour by the conversion factor of 1 gallon of mineral spirits used per 3,600 pounds of production by the emission factor of 6.7 pounds of VOC emitted per gallon of mineral spirits.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 0.66 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton. Since emissions units K003 and K004 share an oven, divide this amount in half to obtain the allowable annual emission rate for each.

c. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.005 ton per

year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton. Since emissions units K003 and K004 share an oven, divide this amount in half to obtain the allowable annual emission rate for each.

d. Emission Limitation:

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 0.55 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton. Since emissions units K003 and K004 share an oven, divide this amount in half to obtain the allowable annual emission rate for each.

f. Emission Limitation:

Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 145 pounds of coating per hour by the emission factor of 0.005 pound of VOC emitted per pound of coating (formulation data.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

g. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

h. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

i. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

j. Emission Limitation:

Particulate matter (PM) emissions associated with blanking and forming covers from this emissions unit shall not exceed 0.551 pounds per hour, nor 2.41 ton per year.

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(10).

k. Emission Limitation:

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 - UN Auto Cover Line (modification)	OAC rule 3745-31-02(A)(2)	See A.2.a through A.2.i, B.1, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-10(B)(1)	See A.2.j below.
	OAC rule 3745-21-09(U)(1)	Zero pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.i below.

2. Additional Terms and Conditions

2.a Volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents associated with the use of mineral spirits shall not exceed 1.67 pounds per hour, nor 7.33 tons per year.

2.b Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 1.31 tons per year.

2.c Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.01 ton per year.

2.d Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

2.e Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 1.10 tons per year.

2.f Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

2.g Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.h Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.i Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.j The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2.k The hourly and yearly allowable ammonia emission limits are based on the emissions unit's potential to emit. Therefore, no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with these limitations.

B. Operational Restrictions

1. Natural gas shall be the only fuel used to fire the curing oven for this emissions unit.

2. Processing of cold rolled steel shall be limited to 4,500 pounds per hour.

3. No HAPs are emitted from this emissions unit. Therefore no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with the limitations in terms A.2.h. and A.2.i.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the quantity of mineral spirits used, in gallons.

2. The permit to install for this emissions unit (K005) 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: ammonia

   TLV (mg/m3): 17

   Maximum Hourly Emission Rate (lbs/hr): 0.73

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 104.1

   MAGLC (ug/m3): 404.76

   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.).

3. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month in which the noncomplying coating was employed.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compounds (VOC) per gallon of coating, excluding water and exempt

solvents associated with the use of mineral spirits shall not exceed 1.67 pounds per hour, nor 7.33 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 4,500 pounds per hour by the conversion factor of 1 gallon of mineral spirits used per 18,000 pounds of production by the emission factor of 6.7 pounds of VOC emitted per gallon of mineral spirits.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 1.31 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.01 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 1.10 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

f. Emission Limitation:

Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 145 pounds of coating per hour by the emission factor of 0.005 pound of VOC emitted per pound of coating (formulation data.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

g. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a

rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

h. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

i. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

F. Miscellaneous Requirements

None

Emissions Unit ID: **K006**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - Standard Auto Cover Line (modification)	OAC rule 3745-31-02(A)(2)	See A.2.a through A.2.i, B.1, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-10(B)(1)	See A.2.j below.
	OAC rule 3745-21-09(U)(1)	Zero pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.i below.

2. Additional Terms and Conditions

2.a Volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents associated with the use of mineral spirits shall not exceed 1.67 pounds per hour, nor 7.33 tons per year.

2.b Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 1.31 tons per year.

2.c Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.01 ton per year.

2.d Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

2.e Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 1.10 tons per year.

2.f Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

2.g Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.h Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.i Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.j The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2.k The hourly and yearly allowable ammonia emission limits are based on the emissions unit's potential to emit. Therefore, no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with these limitations.

B. Operational Restrictions

1. Natural gas shall be the only fuel used to fire the curing oven for this emissions unit.

2. Processing of cold rolled steel shall be limited to 4500 pounds per hour.

3. No HAPs are emitted from this emissions unit. Therefore no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with the limitations in terms A.2.h. and A.2.i.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the quantity of mineral spirits used, in gallons.

2. The permit to install for this emissions unit (K006) 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: ammonia

   TLV (mg/m3): 17

   Maximum Hourly Emission Rate (lbs/hr): 0.73

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 104.1

   MAGLC (ug/m3): 404.76

   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.).

3. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month in which the noncomplying coating was employed.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compounds (VOC) per gallon of coating, excluding water and exempt

solvents associated with the use of mineral spirits shall not exceed 1.67 pounds per hour, nor 7.33 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 4,500 pounds per hour by the conversion factor of 1 gallon of mineral spirits used per 18,000 pounds of production by the emission factor of 6.7 pounds of VOC emitted per gallon of mineral spirits.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 1.31 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.01 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

Emissions Unit ID: **K006**

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 1.10 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

f. Emission Limitation:

Ammonia emissions shall not exceed 0.73 pound per hour, nor 3.2 tons per year.

Applicable Compliance Method:

Multiply the maximum production rate of 145 pounds of coating per hour by the emission

factor of 0.005 pound of VOC emitted per pound of coating (formulation data.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

g. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

h. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

i. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

F. Miscellaneous Requirements

None

Emissions Unit ID: **K007**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K007 - Hand Line Bottoms (two presses) (modification)	OAC rule 3745-31-02(A)(2)	See A.2.a through A.2.h, and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-10(B)(1)	See A.2.i below.
	OAC rule 3745-21-09(U)(1)	See A.2.a below.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.h below.

2. Additional Terms and Conditions

2.a There shall be zero pounds of volatile organic compounds (VOC) and zero pounds of hazardous air pollutants (HAPs) per gallon of coating, excluding water and exempt solvents associated with the two (2) presses for blanking/forming covers and applying gasket material.

2.b Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 1.31 tons per year.

2.c Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off

oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.01 ton per year.

2.d Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

2.e Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 1.10 tons per year.

2.f Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.g Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.h Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.i The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

B. Operational Restrictions

1. Natural gas shall be the only fuel used to fire the curing oven for this emissions unit.

2. No HAPs are emitted from this emissions unit. Therefore no additional record keeping, reporting, nor emissions calculations are required to ensure ongoing compliance with the limitations in terms A.2.g and A.2.h.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for the purpose of determining compliance with A.2.a above:

   a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month in which the noncomplying coating was employed.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:

There shall be zero pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents associated with the two (2) presses for blanking/forming covers and applying gasket material.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of section C.1 of this permit.

b. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.30 pound per hour, nor 1.31 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.002 pound per hour, nor 0.01 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.023 pound per hour, nor 0.10 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000

BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.25 pound per hour, nor 1.10 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 3.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

f. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

g. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

h. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

F. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K008 - Spray Lining Paint Line (new addition)	OAC rule 3745-31-05(A)(3)	See A.2.a through A.2.s, and B.1 through B.12 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-21-09(B)(6), 3745-21-09(U)(1), and 3745-35-07(B)
	OAC rule 3745-17-10(B)(1)	See A.2.t below.
	OAC rule 3745-21-09(B)(6)	See B.1 below.
	OAC rule 3745-21-09(U)(1)	See A.2.t and B.1 below.
	OAC rule 3745-35-07(B)	See A.2.a through A.2.s, and B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.028 pound per hour, nor 0.12 ton per year.

2.b Volatile organic compound (VOC) emissions associated with painting operations shall not

exceed 2.28 pound per hour, nor 10.0 tons per year.

2.c Volatile organic compound (VOC) emissions associated with the clean-up operations shall not exceed 11.07 pounds per week, nor 0.29 ton per year. All emissions from clean-up are methyl ethyl ketone (MEK), which is a hazardous air pollutant (single HAP).

2.d Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.50 pound per hour, nor 2.20 tons per year.

2.e Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.003 pound per hour, nor 0.01 ton per year.

2.f Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.038 pound per hour, nor 0.17 ton per year.

2.g Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.42 pound per hour, nor 1.84 tons per year.

2.h Formaldehyde emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

2.i Methanol emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.14 ton per year.

2.j Xylene emissions associated with painting operations shall not exceed 0.25 pound per hour, nor 1.08 tons per year.

2.k Methyl Isobutyl ketone (MIBK) emissions associated with painting operations shall not exceed 0.04 pound per hour, nor 0.19 ton per year.

2.l Ethyl benzene emissions associated with painting operations shall not exceed 0.05 pound per hour, nor 0.22 ton per year.

2.m Napthalene emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

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2.n Toluene emissions associated with painting operations shall not exceed 0.53 pound per hour, nor 2.32 tons per year.

2.o Methyl ethyl ketone emissions associated with painting operations shall not exceed 0.91 pound per hour, nor 4.00 tons per year.

2.p Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

2.q Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

2.r Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

2.s In lieu of complying with the pounds of organic material (OC) per gallon of solids limitation contained in OAC rule 3745-21-09(U)(1), the permittee has chosen to employ a control device (regenerative thermal oxidizer) and will demonstrate that the capture and control efficiency provide not less than an eighty one percent reduction, by weight, in the overall OC emissions from the coating line and that the control device has a destruction efficiency of not less than ninety percent, by weight, for the OC emissions vented to the control device in accordance with OAC rule 3745-21-09(B)(6).

2.t The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. When either of emissions units K001 or K008, or both, are in operation, the permittee shall employ a regenerative thermal oxidizer (RTO) which shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

2. The Paint Line booth shall be totally enclosed, with a 100% capture efficiency.

3. Production on the Paint Line shall be limited to 80 steel covers per minute, with one gallon coating approximately 600 covers.

4. The VOC content of the coatings used in the paint line shall be limited to 5.7 pounds per gallon.

5. The maximum amount of thinning is two parts coating to one part MEK.

6. The maximum density of the coatings used in the paint line as applied that are thinned shall be 9.70 pounds per gallon.

7. The maximum density of the coatings used in the paint line as applied that are not thinned shall be 7.80 pounds per gallon.

8. The maximum amount of MEK used as clean-up solvent shall be 55 gallons per week. The

minimum recovery rate from off-site hazardous waste disposal shall be 40%.

9. All clean-up shall be conducted inside the booth with the RTO in operation.

10. The Paint Line shall use a natural gas fired dry-off oven to cure the parts. The oven's exhaust gases shall be connected to the RTO.

11. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

12. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

   The permittee shall collect and record the following information for each day for the control equipment:

   a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

2. The permittee shall collect and record the following information each month for the purpose of determining rolling 12-month summation of emissions of VOC's and HAP's:

   a. The name and identification number of each coating, as applied.

   b. The VOC content of each coating, as applied, in pounds per gallon

c. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

d. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)].

e. The number of gallons of each coating employed.

f. The name and identification of each cleanup material employed.

g. The number of gallons of each cleanup material employed.

h. The VOC content of each cleanup material, in pounds per gallon.

i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

j. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)].

k. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

l. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (c) times (e) for each coating plus the sum of (i) times (g) for each cleanup material];

m. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for each coating plus the sum of (j) times (g) for each cleanup material].

n. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

o. The calculated, controlled individual hazardous air pollutant (single HAP) emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

p. The calculated, controlled total hazardous air pollutant (total HAP) emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall install, maintain and operate monitoring devices which measure the pressure inside and outside the permanent total enclosure. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

a. The difference in pressure between the permanent total enclosure and the surrounding area(s).

b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

4. The permit to install for this emissions unit (K008) 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: formaldehyde

TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 0.75

MAGLC (ug/m3): 8.77

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.).

5. 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 deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

2. The permittee shall submit quarterly summaries of the following records:

   a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

   c. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

   These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The permittee shall also submit annual reports which specify the total VOC, total individual HAP, and total combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

   a. Emission Limitation:

      Volatile organic compound emissions associated with natural gas combustion for the

dry-off oven from this emissions unit shall not exceed 0.028 pounds per hour, nor 0.12 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 5.5 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

Volatile organic compound emissions associated with painting operations shall not exceed 2.28 pound per hour, nor 10.0 tons per year.

Applicable Compliance Method:

Multiply the maximum Paint Line production rate of 80 steel covers per minute by the paint application rate of 1 gallon per 600 covers, by the maximum VOC content of the coatings used in the paint line, 5.7 pounds of VOC per gallon, then multiply by the conversion factor of 60 minutes per hour. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

Volatile organic compound emissions associated with the clean-up operations shall not exceed 11.07 pounds per week, nor 0.29 ton per year. All emissions from clean-up are methyl ethyl ketone (MEK), which is a hazardous air pollutant (single HAP).

Applicable Compliance Method:

The maximum MEK usage rate for clean-up operations of 55 gallons per week is multiplied by the emission factor of 6.71 pounds per gallon. This weekly emission rate is reduced by a recovery rate of forty percent (multiply by a factor of 1 - 0.40), which is the weekly amount of MEK emitted prior to control. This emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per week limitation by 52 weeks per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

Oxides of nitrogen (NOx) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.50 pound per hour, nor 2.20 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 100 pounds of NOx emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

Sulfur dioxide (SO2) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.003 pound per hour, nor 0.01 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 0.6 pounds of SO2 emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

f. Emission Limitation:

Particulate matter (PM) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.038 pound per hour, nor 0.17 ton per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 7.6 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

g. Emission Limitation:

Carbon monoxide (CO) emissions associated with natural gas combustion for the dry-off oven from this emissions unit shall not exceed 0.42 pound per hour, nor 1.84 tons per year.

Applicable Compliance Method:

Emissions factors for natural gas combustion were chosen from SCC 1-02-006-03 which is a natural gas fired industrial boiler with a heat input capacity of less than 10 million BTU per hour. The emission factors were obtained from EPA's FIRE Version 6.22.

Multiply the emission factor of 5.0 mmBTU/hour by the number of cubic feet per 1,000 BTU by the emission factor of 84 pounds of VOC emitted per thousand cubic feet burned.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

h. Emission Limitation:

Formaldehyde emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (0.7% formaldehyde), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

i. Emission Limitation:

Methanol emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.14 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (0.8% methanol), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

j. Emission Limitation:

Xylene emissions associated with painting operations shall not exceed 0.25 pound per hour, nor 1.08 tons per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (7.9% xylene), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

k. Emission Limitation:

Methyl Isobutyl ketone (MIBK) emissions associated with painting operations shall not exceed 0.04 pound per hour, nor 0.19 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (1.4% MIBK), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

l. Emission Limitation:

Ethyl benzene emissions associated with painting operations shall not exceed 0.05 pound per hour, nor 0.22 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (1.6% ethyl benzene), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

m. Emission Limitation:

Napthalene emissions associated with painting operations shall not exceed 0.03 pound per hour, nor 0.12 ton per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (0.7% napthalene), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

n. Emission Limitation:

Toluene emissions associated with painting operations shall not exceed 0.53 pound per hour, nor 2.32 tons per year.

Applicable Compliance Method:

The maximum HAP concentration by weight (17.0% toluene), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 7.80 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 -

destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

o. Emission Limitation:

Methyl ethyl ketone emissions associated with painting operations shall not exceed 0.91 pound per hour, nor 4.00 tons per year.

Applicable Compliance Method:

The maximum HAP concentration by weight, after thinning (23.5% MEK), of the maximum painting rate of 8.0 gallons per hour is multiplied by the emission factor of 9.70 pounds per gallon. This hourly emission rate is reduced by the destruction efficiency of the regenerative thermal oxidizer calculated by the most recent compliance test (multiply by a factor of 1 - destruction efficiency percentage.)

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

p. Emission Limitation:

Total VOC emissions from this facility shall not exceed 72.56 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

Add the total VOC potential to emit, in tons per year, for each emissions unit in the facility, based upon a rolling, 12-month summation.

q. Emission Limitation:

Total emissions from any individual hazardous air pollutant (single HAP) for this facility shall not exceed 8.72 tons per year, based upon a rolling, 12-month summation of the monthly single HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, of MEK, associated with both the painting

operations and the clean-up operations of both emissions units K001 and K008, based upon a rolling, 12-month summation.

r. Emission Limitation:

Total hazardous air pollutant (total HAP) emissions for this facility shall not exceed 17.25 tons per year, based upon a rolling, 12-month summation of the monthly total HAP emissions.

Applicable Compliance Method:

Add the potential to emit, in tons per year, for all HAPs in both emissions units K001 and K008, based upon a rolling, 12-month summation.

2. Compliance with the operational restrictions shall be determined in accordance with the following methods:

a. Operational Restriction:

When either of emissions units K001 or K008, or both, are in operation, the permittee shall employ a regenerative thermal oxidizer which shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

ii. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below.. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

v. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

None