

Synthetic Minor Determination and/or Netting Determination

Permit To Install 16-02292d

A. Source Description

Heritage Industrial Finishing Corp. (Heritage) (Facility ID: 16-77-01-0272) is located in Summit County. The facility is a paint job shop. The emissions units covered by this PTI constitute ten paint spray booths.

Emissions unit K005 is the Three Gallon Booth. Emissions units K006 and K007 comprise the Heritage Line. Emissions unit K008 is the Smitty Line. Emissions unit K009 is the Cleveland Line. Emissions unit K010 is the Floor Booth. Emissions units K011, K012, K013 and K014 comprise the J Line.

Heritage was issued PTI 16-02095 on February 6, 2001 which limited the organic compounds (OC) emissions from these ten emissions units (permitted as five emissions units in PTI 16-02095) to 137.4 tons per year. Heritage is requesting federally enforceable limitations, limiting the VOC emissions from these ten emissions units to 89.8 tons per year. Heritage is also requesting a facility wide HAP emissions limitation limiting the HAP emissions to less than 10 tons per year for individual HAPs and 25 tons per year for all HAPs combined.

B. Facility Emissions and Attainment Status

Heritage is currently considered a major source for purposes of Title V due to the current emissions allowable of 137.4 tons VOC per year from these ten emissions units. The actual emissions are significantly less and well below major source thresholds.

Summit County is designated as an attainment area for all criteria pollutants, except for NOx and Ozone.

C. Source Emissions

The emissions occur mainly from painting operations in emissions units K005 thru K014 from the use of coatings and cleanup materials. The facility can paint on both metal and non-metal parts. When coating on metal parts, all emissions units use compliance coatings with the exception of emissions unit K005, which uses non-compliance coatings to meet certain military specs on some jobs and is limited to 3 gallons per day of coating use.

D. Conclusion

Heritage is voluntarily applying for this PTI to request federally enforceable restrictions, reducing the VOC emissions allowable from 137.4 tons per year to 89.8 tons per year from these ten emissions units. Heritage is also requesting a facility wide HAPs emissions limitation limiting the HAP emissions to less than 10 tons per year for individual HAPs and 25 tons per year for all HAPs combined.

Heritage proposes to maintain monthly usage records for coatings and cleanup materials to demonstrate compliance with the proposed permit limits.

The VOC emissions from these ten emissions units will be limited to 89.8 tons per year. The total VOC emissions from any other insignificant emissions units at the facility, such as ovens, space heaters etc. are below 5 tons per year. Thus, the VOC emissions from the potential facility, after the issuance of this PTI, will be less than 100 tons per year.

Since the proposed facility emission limitations are less than 100 tons per year for criteria pollutants, less than 10 tons per year for individual HAPs, and less than 25 tons per year for combined HAPs, the facility will be considered a synthetic minor source for the purposes of both avoiding Title V permitting and Non-attainment provisions requirements.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 16-02292

Fac ID: 1677010272

DATE: 8/12/2004

Heritage Industrial Finishing Div
Karla Kay
1874 Englewood Ave
Akron, OH 443121002

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

ARAQMD

Akron Metro Area Transportation Study

WV

PA

SUMMIT COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02292 FOR AN AIR CONTAMINANT SOURCE FOR
HERITAGE INDUSTRIAL FINISHING DIV**

On 8/12/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Heritage Industrial Finishing Div**, located at **1874 Englewood Ave, Akron, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02292:

Modification for Synthetic Minor Strategy for Title V, Replaces 16-02095, Issued 02/06/01.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 16-02292

Application Number: 16-02292
Facility ID: 1677010272
Permit Fee: **To be entered upon final issuance**
Name of Facility: Heritage Industrial Finishing Div
Person to Contact: Karla Kay
Address: 1874 Englewood Ave
Akron, OH 443121002

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

**1874 Englewood Ave
Akron, Ohio**

Description of proposed emissions unit(s):

Modification for Synthetic Minor Strategy for Title V, Replaces 16-02095, Issued 02/06/01.

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

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

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

Issued: To be entered upon final issuance

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Heritage Industrial Finishing Div

PTI Application: 16-02292

Issued: To be entered upon final issuance

Facility ID: 1677010272

Heritage Industrial Finishing Div

PTI Application: 16-02292

Issued: To be entered upon final issuance

Facility ID: 1677010272

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC's	89.8
Individual HAP	9.9
Combined HAPs	24.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K005 - Three Gallon Booth - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOC's) uncontrolled. (modification)	<p>OAC rule 3745-31-05(A)(53)</p> <p style="text-align: right;">OAC rule 3745-21-09(U)(2)(e)(ii)</p>
	<p>OAC rule 3745-31-05(C) (to avoid Non-attainment provisions requirements)</p> <p>OAC rule 3745-35-07(B) (to avoid Title V requirements)</p>
	<p>OAC rule 3745-21-07(G)(2)</p>

Applicable Emissions
Limitations/Control Measures

OC emissions shall not exceed 20 lbs/day from coating non-metal parts.

VOC emissions shall not exceed 20 lbs/day from coating metal parts.

OC emissions shall not exceed 3.7 tons per year (tpy).

VOC emissions shall not exceed 3.7 tons per year (tpy).

See term A.2.a and b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(ii), 3745-31-05(C), and 3745-35-07(B).

See terms B.2 below.

The OC pounds per day emissions limitation established by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05 (A)(3).

See term B.1 below.

2. Additional Terms and Conditions

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

**Herita
PTI A**

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average.
- 2.c** The tons per year allowables in term A.1 above were established based upon potential to emit and therefore no additional record keeping and reporting requirements are required to comply with those limitations.

B. Operational Restrictions

- 1. The permittee shall employ no more than three gallons of coatings in any one day when coating metal parts in this emissions unit.
- 2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Cumulative Maximum Allowable Single HAP Usage In Tons</u>	<u>Cumulative Maximum Allowable Combined HAP Usage In Tons</u>
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install,

Emissions Unit ID: **K005**

compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

** This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for coating metal parts:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, as applied, in pounds per gallon.
 - c. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.
 - d. The volume of each coating employed, in gallons
 - e. The volume of each volatile organic cleanup material employed, in gallons.
 - f. The total daily VOC emissions from all coatings, as applied and volatile organic cleanup materials, in pounds calculated as below:

$$\begin{aligned} \text{Daily VOC emissions} = & \\ & (\text{sum of [b x d] for all coatings}) + \\ & (\text{sum of [c x e] for all volatile organic cleanup materials}). \end{aligned}$$

2. The permittee shall collect and record the following information each day for coating non-metal parts:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation on whether or not the coating and/or organic cleanup material is photochemically reactive.
 - c. The number of gallons of each coating and cleanup material employed.
 - d. The organic compound content of each coating and cleanup material, in pounds per gallon.
 - e. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day [the sum of c x d] for each coating and cleanup material employed].
 - f. The total number of hours the emissions unit was in operation.

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- g. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall calculate the total daily VOC and OC emissions from this emissions unit by taking the sum of C.1.f and C.2.e, in pounds per day.
- 4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

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- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the average actual hourly organic compound emissions for each such day.
 - b. An identification of each day during which the daily organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 20 pounds per day, and the actual daily organic compound emissions for each such day.
 - c. An identification of each day during which the daily volatile organic compound emissions, for coating metal parts, from the coatings and cleanup materials exceeded 20 pounds per day, and the actual daily volatile organic compound emissions for each such day.

- d. The total individual HAP emission limitation for each HAP from all coatings and clean up materials employed, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - e. The total combined HAP emission limitation for each HAP from all coatings and clean up materials employed, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
 4. The permittee shall submit annual reports which specify the VOC, OC, and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: OC emissions shall not exceed 8 lbs/hr when coating non-metal parts and using photochemically reactive materials and 20 lbs /day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - b. Emission Limitation: VOC emissions shall not exceed 20 lbs /day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - c. Gallons Usage Limitation: no more than three gallons of coatings in any one day in this emissions unit when coating metal parts.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Sections C.
 - d. Emission Limitation: The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

Heritage Industrial Finishing Div
PTI Application: 16-02095
Issued

Facility ID: 1677010272

Emissions Unit ID: **K005**

F. Miscellaneous Requirements

1. 1. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K005.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
<p>K006 - Heritage Line Booth 1 (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compound (VOC's) uncontrolled, with flash-off oven shared with emissions unit K007. (modification.)</p>	<p>cure oven</p> <p>OAC rule 3745-31-05 (A)(5)</p> <p>OAC rule 3745-31-05(C) (to avoid Non-attainment provisions Title V requirements) OAC rule 3745-35-07(B) (to avoid Title V requirements)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-21-09(U)(1)(c)</p>

Issued: To be entered upon final issuance

OAC rule 3745-15-05

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC from emissions units K006 and K007 shall not exceed 18.3 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

See section B.1 and 2 below.

See section A.2.b below.

The emission of VOC shall not exceed 3.5 pounds of VOC gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions from the oven associated with this emissions unit were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential annual emissions of PE, PM10, CO, NO_x, OC, and SO₂ were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emissions limitations.

B. Operational Restrictions

- 1. The permittee shall not employ more than 18.3 tons VOC/year (VOC input) as a rolling, 12-month summation, combined for emissions unit K006 and K007 from coating and volatile organic cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

- 2. The maximum usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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Heritage Industrial Finishing Div

PTI Application: 16-02202

Issued

Facility ID: 1677010272

Emissions Unit ID: K006

<u>Month(s)</u>	<u>In Tons</u>	Cumulative Maximum Allowable Single HAP Usage	Cumulative Maximum Allowable Combined HAP Usage <u>In Tons</u>
1	2.0		5.0
1-2	4.0		10.0
1-3	5.5		13.7
1-4	7.0		17.5
1-5	8.0		20
1-6	8.5		21.2
1-7	8.9		22.2
1-8	9.2		23.0
1-9	9.4		23.5
1-10	9.6		24.0
1-11	9.8		24.5
1-12	9.9		24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month from emissions units K006 and K007:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

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- b. The rolling, 12-month summation of VOC emissions and VOC input from emissions units K006 and K007, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input =
(monthly VOC emissions and VOC input from (a) + sum of monthly VOC emissions and VOC input from previous 11 calendar months)/2000.

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4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
 - k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
 - l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by

contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit quarterly deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 18.3 tons per year (VOC input) limitation as a rolling, 12-month summation, combined emissions units K006 and K007 from coating and volatile organic clean up material usage.
 - d. Which identify all exceedances of the total VOC emissions combined from emissions units K006 and K007, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit quarterly deviation (excursion) reports in accordance with the General

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4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014 along with. These reports shall be submitted by January 31 of each year.

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E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.

- c. Emission Limitation: 18.3 tons VOC/year (VOC input) as a rolling, 12-month summation, combined for emissions unit K006 and K007 from coating and organic cleanup material usage.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 18.3 tpy VOCs as a rolling, 12-month summation combined for emissions units K006 and K007

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

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Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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Emissions Unit ID: **K006**

F. Miscellaneous Requirements

1. 1. This emissions unit and emissions unit K007 were previously permitted as one emissions unit - K001. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K001.

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Emissions Unit ID: **K007****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	cure oven	<u>Applicable Rules/Requirements</u>
K007 - Heritage Line Booth 2 (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOC's) uncontrolled, with flash-off oven shared with emissions unit K006 (modification)		<p>OAC rule 3745-31-05 (A)(5)</p> <p>OAC rule 3745-31-05(C) (to avoid Non-attainment provisions) OAC rule 3745-35-07(B) (to avoid Title V requirements)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-21-09(U)(1)(c)</p> <p>OAC rule 3745-15-05</p>

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Emissions Unit ID: **K007**

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC from emissions units K006 and K007 shall not exceed 18.3 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

See terms B.1 and 2 below.

See term A.2.b below.

The emission of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

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- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NOx, OC, and SO2 were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

- 1. The permittee shall not employ more than 18.3 tons VOC/year (VOC input) as a rolling, 12-month summation, combined for emissions unit K006 and K007 from coating and volatile organic cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

- 2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>In Tons</u>	Cumulative Maximum Allowable Single HAP Usage	Cumulative Maximum Allowable Combined HAP Usage <u>In Tons</u>
1	2.0		5.0
1-2	4.0		10.0
1-3	5.5		13.7
1-4	7.0		17.5
1-5	8.0		20
1-6	8.5		21.2
1-7	8.9		22.2
1-8	9.2		23.0
1-9	9.4		23.5
1-10	9.6		24.0
1-11	9.8		24.5
1-12	9.9		24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K006 and K007:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

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- e. The volume of each coating employed, in gallons
- f. The volume of each volatile organic cleanup material employed, in gallons.
- g. The total monthly VOC emissions and VOC input *from all coatings, as applied and volatile organic cleanup materials, in pounds calculated as below:

Monthly VOC emissions and VOC input =
(sum of [c x e] for all coatings) +
(sum of [d x f] for all volatile organic cleanup materials).

2. The permittee shall collect and record the following information each day for coating non-metal parts combined for emissions units K006 and K007 when employing photochemically reactive materials:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. Documentation on whether or not the coating and/or organic cleanup material is photochemically reactive.
 - c. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day [the sum of c x d) for each coating and photochemically reactive cleanup material employed].
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain monthly records combined for emissions units K006 and K007

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containing the following:

- a. The total monthly VOC emissions and VOC input from coating metal and non-metal parts combined for emissions units K006 and K007 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.

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- b. The rolling, 12-month summation of VOC emissions and VOC input combined for emissions units K006 and K007, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input =
(monthly VOC emissions and VOC input from (a) + sum of monthly VOC emissions and VOC input from previous 11 calendar months)/2000.

4. The permittee shall collect and record the following information each month from this facility:
- a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
 - k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of

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the permit, this shall be a cumulative total for all months since the issuance of the PTI.

1. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 18.3 tons per year (VOC input) limitation as a rolling, 12-month summation, combined emissions units K006 and K007 from coating and volatile organic clean up material usage.
 - d. Which identify all exceedances of the total VOC emissions combined from emissions units K006 and K007, in pounds or tons per rolling 12-month period.

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- e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
 4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the OC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.
 - c. Emission Limitation: 18.3 tons VOC/year (VOC input) as a rolling, 12-month summation, combined for emissions unit K006 and K007 from coating and organic cleanup material usage.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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- d. Emission Limitation: 18.3 tpy VOCs as a rolling, 12-month summation combined for emissions units K006 and K007

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

F. Miscellaneous Requirements

1. 1. This emissions unit and emissions unit K007 were previously permitted as one emissions unit - K001. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K001.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K008 - Smitty Line (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOC's) uncontrolled, with flash-off oven (modification)	OAC rule 3745-31-05 (A)(5)	See term A.2.a below.
	OAC rule 3745-31-05(C) (to avoid Non-attainment provisions) OAC rule 3745-35-07(B) (to avoid Title V requirements)	See term A.2.b below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B). The emissions of VOC shall not exceed 7 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.
	OAC rule 3745-21-07(G)(2)	See terms B.1 and 2 below.
	OAC rule 3745-21-09(U)(1)(c)	See term A.2.b below. The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.
cure oven	OAC rule 3745-15-05	See term A.2.c below.

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Emissions Unit ID: **K008**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NO_x, OC, and SO₂ were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

- 1. The permittee shall not employ more than 7 tons VOC/year (VOC input) as a rolling, 12-month summation from coating and volatile organic cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

- 2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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<u>Month(s)</u>	<u>In Tons</u> Cumulative Maximum Allowable Single HAP Usage	<u>In Tons</u> Cumulative Maximum Allowable Combined HAP Usage
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.
 - e. The volume of each coating employed, in gallons

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parts calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.

- b. The rolling, 12-month summation of VOC emissions and VOC input*, in tons, calculated as below:

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Rolling, 12-month summation of VOC emissions and VOC input* =
(monthly VOC emissions and VOC input* from (a) + sum of monthly VOC
emissions and VOC input* from previous 11 calendar months)/2000.

4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
 - k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
 - l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 7 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.
 - d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds

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or tons per month and pounds or tons per rolling 12-month period.

3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.

- c. Emission Limitation: 7 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 7 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

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Facility ID: 1677010272

Emissions Unit ID: **K008**

- e. Emission Limitation: The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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Emissions Unit ID: **K008**

F. Miscellaneous Requirements

1. 1. This emissions unit and emissions unit K007 were previously permitted as one emissions unit - K001. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K001.

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PTI A

Emissions Unit ID: **K009****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	cure oven	<u>Applicable Rules/Requirements</u>
K009 - Cleveland Line (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOC's) uncontrolled, with batch oven shared with emissions unit K010 (modification)		<p>OAC rule 3745-31-05 (A)(5)</p> <p>OAC rule 3745-31-05(C) (to avoid Non-attainment provisions)</p> <p>OAC rule 3745-35-07(B) (to avoid Title V requirements)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-21-09(U)(1)(c)</p>

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OAC rule 3745-15-05

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC shall not exceed 7 tons per year (TPY), combined for emissions units K009 and K010 based upon a rolling, 12-month summation of the monthly emissions.

See terms B.1 and 2 below.

See term A.2.b below.

The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

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- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NOx, OC, and SO2 were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

1. The permittee shall not employ more than 7 tons VOC/year (VOC input) as a rolling, 12-month summation combined for emissions units K009 and K010 from coating and volatile cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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Emissions Unit ID: K009

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<u>Month(s)</u>	<u>Cumulative Maximum Allowable Single HAP Usage In Tons</u>	<u>Cumulative Maximum Allowable Combined HAP Usage In Tons</u>
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K009 and K010:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

containing the following:

- a. The total monthly VOC emissions and VOC input* from coating metal and non-metal parts combined for emissions units K009 and K010 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.
- b. The rolling, 12-month summation of VOC emissions and VOC input* combined for emissions units K009 and K010, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input* =

(monthly VOC emissions and VOC input* from (a) + sum of monthly VOC emissions and VOC input* from previous 11 calendar months)/2000.

4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

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times (h) for each cleanup material].

- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 7 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.

- d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
 4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - b. 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.
 - c. Emission Limitation: 7 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

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Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 7 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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PTI A

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Emissions Unit ID: **K009**

F. Miscellaneous Requirements

1. 1. This emissions unit and emissions unit K010 were previously permitted as one emissions unit - K003. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K003.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	cure oven	<u>Applicable Rules/Requirements</u>
K010 - Floor Booth (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOCs) uncontrolled, with batch oven shared with emissions unit K009 (modification)		OAC rule 3745-31-05 (A)(5) OAC rule 3745-31-05(C) (to avoid Non-attainment provisions) OAC rule 3745-35-07(B) (to avoid Title V requirements) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)(c) OAC rule 3745-15-05

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC shall not exceed 7 tons per year (TPY), combined for emissions units K009 and K010 based upon a rolling, 12-month summation of the monthly emissions.

See term B.1 and 2 below.

See term A.2.b below.

The emissions of VOC shall not exceed 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NOx, OC, and SO2 were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

- 1. The permittee shall not employ more than 7 tons VOC/year (VOC input) as a rolling, 12-month summation combined for emissions units K009 and K010 from coating and volatile cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

- 2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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<u>Month(s)</u>	<u>Cumulative Maximum Allowable Single HAP Usage In Tons</u>	<u>Cumulative Maximum Allowable Combined HAP Usage In Tons</u>
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K009 and K010:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

- e. The volume of each coating employed, in gallons
- f. The volume of each volatile organic cleanup material employed, in gallons.
- g. The total monthly VOC emissions and VOC input* from all coatings, as applied and volatile organic cleanup materials, in pounds calculated as below:

$$\begin{aligned} \text{Monthly OC emissions and VOC input*} = \\ (\text{sum of [c x e] for all coatings}) + \\ (\text{sum of [d x f] for all volatile organic cleanup materials}). \end{aligned}$$

2. The permittee shall collect and record the following information each day for coating non-metal parts combined for emissions units K009 and K010 when employing photochemically reactive materials:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. Documentation on whether or not the coating and/or organic cleanup material is photochemically reactive.
 - c. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day [the sum of c x d) for each coating and photochemically reactive cleanup material employed].
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain monthly records combined for emissions units K009 and K010

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containing the following:

- a. The total monthly VOC emissions VOC input* from coating metal and non-metal parts combined for emissions units K009 and K010 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.
- b. The rolling, 12-month summation of VOC emissions and VOC input* combined for emissions units K009 and K010, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input* =
(monthly VOC emissions VOC input* from (a) + sum of monthly VOC emissions VOC input* from previous 11 calendar months)/2000.
4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

times (h) for each cleanup material].

- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 7 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.

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- d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
 4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.
 - c. Emission Limitation: 7 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 7 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The maximum usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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PTI A

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Emissions Unit ID: **K010**

F. Miscellaneous Requirements

1. 1. This emissions unit and emissions unit K009 were previously permitted as one emissions unit - K003. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K003.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	cure oven	<u>Applicable Rules/Requirements</u>
K011 - J Line Booth 1 (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOC's) uncontrolled, with flash-off oven shared with emissions unit K012 (modification)		OAC rule 3745-31-05 (A)(5) OAC rule 3745-31-05(C) (to avoid Non-attainment provisions) OAC rule 3745-35-07(B) (to avoid Title V requirements) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)(c)

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OAC rule 3745-15-05

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC shall not exceed 53.8 tons per year (TPY), combined for emissions units K011, K012, K013, and K014 based upon a rolling, 12-month summation of the monthly emissions.

See terms B.1 and 2.

See term A.2.b below.

The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

2. Additional Terms and Conditions

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating

non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NOx, OC, and SO2 were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

1. The permittee shall not employ more than 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation combined for emissions units K011, K012, K013, and K014 from coating and volatile cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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<u>Month(s)</u>	<u>Cumulative Maximum Allowable Single HAP Usage In Tons</u>	<u>Cumulative Maximum Allowable Combined HAP Usage In Tons</u>
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K011, K012, K013, and K014:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

and K014 containing the following:

- a. The total monthly VOC emissions and VOC input* from coating metal and non-metal parts combined for emissions units K011, K012, K013, and K014 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.
- b. The rolling, 12-month summation of VOC emissions and VOC input* combined for emissions units K011, K012, K013, and K014, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input*=
(monthly VOC emissions and VOC input* from (a) + sum of monthly
VOC emissions and VOC input* from previous 11 calendar months)/2000.
4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

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times (h) for each cleanup material].

- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 7 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.

- d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
 4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.
 - c. Emission Limitation: 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

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Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 53.8 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The maximum usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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PTI A

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Emissions Unit ID: **K011**

F. Miscellaneous Requirements

1. 1. This emissions unit and emissions units K012, K013, and K014 were previously permitted as one emissions unit - K004. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K004.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	cure oven	<u>Applicable Rules/Requirements</u>
K012 - J Line Booth 2 (existing) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds(VOC's) uncontrolled, with flash-off oven shared with emissions unit K011 (modification)		OAC rule 3745-31-05(A)(5) OAC rule 3745-31-05(C) (to avoid Non-attainment provisions) OAC rule 3745-35-07(B) (to avoid Title V requirements) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)(c)

OAC rule 3745-15-05

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC shall not exceed 53.8 tons per year (TPY), combined for emissions units K011, K012, K013, and K014 based upon a rolling, 12-month summation of the monthly emissions.

See terms B.1 and 2 below.

See term A.2b below.

The emissions of VOC shall not exceed 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NO_x, OC, and SO₂ were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

- 1. The permittee shall not employ more than 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation combined for emissions units K011, K012, K013, and K014 from coating and volatile cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

- 2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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<u>Month(s)</u>	<u>Cumulative Maximum Allowable Single HAP Usage In Tons</u>	<u>Cumulative Maximum Allowable Combined HAP Usage In Tons</u>
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K011, K012, K013, and K014:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

- e. The volume of each coating employed, in gallons
- f. The volume of each volatile organic cleanup material employed, in gallons.
- g. The total monthly VOC emissions and VOC input* from all coatings, as applied and volatile organic cleanup materials, in pounds calculated as below:

Monthly VOC emissions and VOC input*=
 (sum of [c x e] for all coatings) +
 (sum of [d x f] for all volatile organic cleanup materials).

- 2. The permittee shall collect and record the following information each day for coating non-metal parts combined for emissions units K011, K012, K013, and K014 when employing photochemically reactive materials:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. Documentation on whether or not the coating and/or organic cleanup material is photochemically reactive.
 - c. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day [the sum of c x d] for each coating and photochemically reactive cleanup material employed].
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall maintain monthly records combined for emissions units K011, K012, K013,

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and K014 containing the following:

- a. The total monthly VOC emissions and VOC input* from coating metal and non-metal parts combined for emissions units K011, K012, K013, and K014 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.
- b. The rolling, 12-month summation of VOC emissions and VOC input* combined for emissions units K011, K012, K013, and K014, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input* =
(monthly VOC emissions and VOC input* from (a) + sum of monthly VOC emissions and VOC input* from previous 11 calendar months)/2000.

4. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total 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 (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

times (h) for each cleanup material].

- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 53.8 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.

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- d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
 4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.
 - b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.
 - c. Emission Limitation: 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

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Facility ID: 1677010272

Emissions Unit ID: **K012**

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 53.8 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The maximum usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

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PTI A

Emissions Unit ID: **K012**

Issued: To be entered upon final issuance

Miscellaneous Requirements

1. 1. This emissions unit and emissions units K011, K013, and K014 were previously permitted as one emissions unit - K004. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K004.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
<p>K013 - J Line Booth 3 (new) - coating of metal and non-metal parts and assemblies, air emissions of both organic compounds (OC's) and volatile organic compounds (VOCs) uncontrolled, with flash-off oven shared with emissions unit K014 (new emissions unit)</p>	<p>cure oven</p> <p>OAC rule 3745-31-05(A)(5)</p> <p>OAC rule 3745-31-05(C) (to avoid Non-attainment provisions)</p> <p>OAC rule 3745-35-07(B) (to avoid Title V requirements)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-21-09(U)(1)(c)</p>

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC shall not exceed 53.8 tons per year (TPY), combined for emissions units K011, K012, K013, and K014 based upon a rolling, 12-month summation of the monthly emissions.

See terms B.1 and 2 below.

See term A.2.a below.

The emissions of VOC shall not exceed 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NO_x, OC, and SO₂ were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

- 1. The permittee shall not employ more than 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation combined for emissions units K011, K012, K013, and K014 from coating and volatile cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

- 2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>In Tons</u>	Cumulative Maximum Allowable Single HAP Usage	Cumulative Maximum Allowable Combined HAP Usage <u>In Tons</u>
1	2.0		5.0
1-2	4.0		10.0
1-3	5.5		13.7
1-4	7.0		17.5
1-5	8.0		20
1-6	8.5		21.2
1-7	8.9		22.2
1-8	9.2		23.0
1-9	9.4		23.5
1-10	9.6		24.0
1-11	9.8		24.5
1-12	9.9		24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K011, K012, K013, and K014:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

and K014 containing the following:

- a. The total monthly VOC emissions and VOC input* from coating metal and non-metal parts combined for emissions units K011, K012, K013, and K014 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.
- b. The rolling, 12-month summation of VOC emissions and VOC input* combined for emissions units K011, K012, K013, and K014, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input* =

(monthly VOC emissions and VOC input* from (a) + sum of monthly VOC emissions and VOC input* from previous 11 calendar months)/2000.

4. The permit to install for K013 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 Toxics 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: Toluene

TLV (ug/m3): 188,405

Maximum Average Hourly Emission Rate (lbs/hr): 12.45

(Emissions units K013 and K014, combined)

Predicted 1-Hour Maximum Ground-Level Concentration at 25 m (ug/m3): 759.6

MAGLC (ug/m3): 4,486

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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics 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

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handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics 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.

- 5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.
- 6. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].

- d. The number of gallons of each coating employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total 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 (f)].
- h. The number of gallons of each cleanup material employed.
- i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
- j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on an individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying coatings. The

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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 during which the non-complying coatings were used.

2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 53.8 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.
 - d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
4. The permittee shall notify the local air agency of any exceedance of the VOC and HAP emissions limitations set forth in the operational restrictions. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitations in Part II, Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of

Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.

- c. Emission Limitation: 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 53.8 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The maximum usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

F. Miscellaneous Requirements

Herita

PTI A

Emissions Unit ID: **K013**

Issued: To be entered upon final issuance

1. 1. This emissions unit and emissions units K011, K012, and K014 were previously permitted as one emissions unit - K004. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K004.

OAC rule 3745-15-05

Applicable Emissions
Limitations/Control Measures

See term A.2.a below.

See term A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(C), and 3745-35-07(B).

The emissions of VOC shall not exceed 53.8 tons per year (TPY), combined for emissions units K011, K012, K013, and K014 based upon a rolling, 12-month summation of the monthly emissions. BAT is carried over from PTI 16-02095.

See terms B.1 and 2 below.

See term A.2.b below.

The emissions of VOC shall not exceed 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

See term A.2.c below.

2. Additional Terms and Conditions

- 2.a** The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

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- 2.b** On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.
- 2.c** The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of PE, PM10, CO, NO_x, OC, and SO₂ were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with emission limitations.

B. Operational Restrictions

1. The permittee shall not employ more than 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation combined for emissions units K011, K012, K013, and K014 from coating and volatile cleanup material usage.

The VOC input* shall be determined by multiplying the number of gallons of coating and volatile organic cleanup material employed per month by the VOC content of each coating and volatile organic cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

*This assumes that 100% of VOCs in the coating and volatile organic cleanup material are emitted.

This is an existing emissions unit and therefore this emissions unit does not need to be limited during the first year after issuance of this permit on a monthly VOC input rate.

2. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

**Herita
PTI A**

Emissions Unit ID: **K014**

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<u>Month(s)</u>	<u>Cumulative Maximum Allowable Single HAP Usage In Tons</u>	<u>Cumulative Maximum Allowable Combined HAP Usage In Tons</u>
1	2.0	5.0
1-2	4.0	10.0
1-3	5.5	13.7
1-4	7.0	17.5
1-5	8.0	20
1-6	8.5	21.2
1-7	8.9	22.2
1-8	9.2	23.0
1-9	9.4	23.5
1-10	9.6	24.0
1-11	9.8	24.5
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation of the HAPs usage figures.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month combined for emissions units K011, K012, K013, and K014:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
 - c. The VOC content of each coating employed, as applied, in pounds per gallon.
 - d. The VOC content of each volatile organic cleanup material employed, in pounds per gallon.

- e. The volume of each coating employed, in gallons
- f. The volume of each volatile organic cleanup material employed, in gallons.
- g. The total monthly VOC emissions and VOC input* from all coatings, as applied and volatile organic cleanup materials, in pounds calculated as below:

Monthly VOC emissions and VOC input* =
(sum of [c x e] for all coatings) +
(sum of [d x f] for all volatile organic cleanup materials).

- 2. The permittee shall collect and record the following information each day for coating non-metal parts combined for emissions units K011, K012, K013, and K014 when employing photochemically reactive materials:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. Documentation on whether or not the coating and/or organic cleanup material is photochemically reactive.
 - c. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day [the sum of c x d) for each coating and photochemically reactive cleanup material employed].
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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3. The permittee shall maintain monthly records combined for emissions units K011, K012, K013, and K014 containing the following:
 - a. The total monthly VOC emissions and VOC input* from coating metal and non-metal parts combined for emissions units K011, K012, K013, and K014 calculated by taking the sum of C.2.e for each day and C.1.g; in pounds per month.
 - b. The rolling, 12-month summation of VOC emissions and VOC input* combined for emissions units K011, K012, K013, and K014, in tons, calculated as below:

Rolling, 12-month summation of VOC emissions and VOC input* =
 (monthly VOC emissions and VOC input* from (a) + sum of monthly VOC emissions and VOC input* from previous 11 calendar months)/2000.

4. The permit to install for K014 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 Toxics 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: Toluene

TLV (ug/m3): 188,405

Maximum Average Hourly Emission Rate (lbs/hr): 12.45

(Emissions units K013 and K014, combined)

Predicted 1-Hour Maximum Ground-Level Concentration at 25 m (ug/m3): 759.7

MAGLC (ug/m3): 4,486

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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup

materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics 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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.
6. The permittee shall collect and record the following information each month from this facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

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- c. 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 (b)].
- d. The number of gallons of each coating employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total 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 (f)].
- h. The number of gallons of each cleanup material employed.
- i. 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 (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
- j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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 records showing the use of non-complying 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 during which the non-complying coatings were used.
2. The permittee shall submit deviation (excursion) reports, which include the following information:
 - a. An identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day which during photochemically reactive materials were employed to coat non-metal parts and the organic compound emissions, for coating non-metal parts, from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Which identify all exceedances of the 53.8 tons per year (VOC input) limitation as a rolling, 12-month summation from coating and volatile organic clean up material usage.
 - d. Which identify all exceedances of the total VOC emissions, in pounds or tons per rolling 12-month period.
 - e. Which identify all exceedances of the total individual HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
 - f. Which identify all exceedances of the total combined HAP emissions limitations, in pounds or tons per month and pounds or tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
4. The permittee shall submit annual reports which specify the VOC and HAP emissions from emissions units K005 thru K014. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Issued: To be entered upon final issuance

1. Compliance with the emission limitations in Part II, Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions from coating non-metal parts shall not exceed 8 lbs per hour average and 40 pounds per day.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- b. Emission Limitation: 3.5 pounds VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts

Applicable Compliance Method: The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct. Compliance shall be determined by the record keeping in Section C.

- c. Emission Limitation: 53.8 tons VOC/year (VOC input) as a rolling, 12-month summation, from coating and organic cleanup material usage.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

- d. Emission Limitation: 53.8 tpy VOCs as a rolling, 12-month summation.

Compliance shall be determined by the record keeping in Section C.

- e. Emission Limitation: The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY ** for any single HAP and 24.9 TPY** for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method: Compliance shall be determined by the record keeping in Section C.

F. Miscellaneous Requirements

Heritage Industrial Finishing Div

PTI Application: 16-02202

Issued

Facility ID: 1677010272

Emissions Unit ID: K014

1. 1. This emissions unit and emissions units K011, K012, and K013 were previously permitted as one emissions unit - K004. The terms and conditions of this PTI supersede all requirements of PTI 16-02095, issued on February 6, 2001 for emissions unit K004.