



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

10/20/2016

Certified Mail

Mr. Steve Mendoza  
Dee Sign Company  
6163 Allen Road  
West Chester, OH 45069

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409000675  
Permit Number: P0121575  
Permit Type: Renewal  
County: Butler

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: SWOQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Dee Sign Company**

Facility ID:	1409000675
Permit Number:	P0121575
Permit Type:	Renewal
Issued:	10/20/2016
Effective:	10/20/2016
Expiration:	10/20/2021





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Dee Sign Company

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**Final Permit-to-Install and Operate**  
Dee Sign Company  
**Permit Number:** P0121575  
**Facility ID:** 1409000675  
**Effective Date:** 10/20/2016

## Authorization

Facility ID: 1409000675  
Application Number(s): A0056782  
Permit Number: P0121575  
Permit Description: FEPTIO renewal for silk screen printing operation, special inks silk screen printing area and roller coating and drying rack operation.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 10/20/2016  
Effective Date: 10/20/2016  
Expiration Date: 10/20/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Dee Sign Company  
6163 Allen Road  
West Chester Twp., OH 45069

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
Dee Sign Company  
**Permit Number:** P0121575  
**Facility ID:** 1409000675  
**Effective Date:** 10/20/2016

## Authorization (continued)

Permit Number: P0121575

Permit Description: FEPTIO renewal for silk screen printing operation, special inks silk screen printing area and roller coating and drying rack operation.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Silk Screen Printing Line
Superseded Permit Number:	P0110724
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Special Inks Silk Screen Printing Area
Superseded Permit Number:	P0108630
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	Roller coating and drying rack operation
Superseded Permit Number:	P0113867
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Dee Sign Company  
**Permit Number:** P0121575  
**Facility ID:** 1409000675  
**Effective Date:** 10/20/2016

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Dee Sign Company  
**Permit Number:** P0121575  
**Facility ID:** 1409000675  
**Effective Date:** 10/20/2016

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2., 3., 4. and 5.
2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P004, and R001, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, 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.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2.
  - a) The name and identification number for each coating and cleanup material employed.
  - b) The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and cleanup material in pounds of individual HAP per gallon of material, as applied.
  - c) The total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (b)].
  - d) The number of gallons of each coating and cleanup material employed.
  - e) 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 and cleanup material].
  - f) 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 and cleanup material].
  - g) The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h) The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.



**Final Permit-to-Install and Operate**

Dee Sign Company

**Permit Number:** P0121575

**Facility ID:** 1409000675

**Effective Date:** 10/20/2016

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis. The HAP recordkeeping is required by 40 CFR Part 63.830(b)(1).

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

4. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the HAP emission limitations outlined in 2. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.



**Final Permit-to-Install and Operate**  
Dee Sign Company  
**Permit Number:** P0121575  
**Facility ID:** 1409000675  
**Effective Date:** 10/20/2016

## **C. Emissions Unit Terms and Conditions**

**1. P001, Silk Screen Printing Line**

**Operations, Property and/or Equipment Description:**

Silk screen printing operation - modified

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(3).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c)(2), d)(2), e)(4) f)(1)b. and f)(2).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound emissions (VOC) shall not exceed 28.4 pounds per hour and 298 pounds per day.  See b)(2)a., c)(1), c)(2) and c)(3).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Volatile Organic Compound emissions (VOC) shall not exceed 18.3 TPY, based on a rolling 12-month summation.  See c)(2).  See Section B.2.

- (2) Additional Terms and Conditions
- a. The daily volume weighted average organic compound VOC content of all coatings employed in this emissions unit shall not exceed 4.38 pounds of VOC per gallon of coating, as applied.
  - b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, emissions and VOC content limitation.
  - c. The hourly mass emissions limit in term b)(1)a. is a maximum value, therefore hourly recordkeeping is not required.
- c) Operational Restrictions
- (1) The maximum daily coating usage for this emissions unit shall not exceed 68 gallons per day.
  - (2) The maximum annual coating usage for this emissions unit shall not exceed 8356 gallons per year based upon a rolling, 12-month summation.
  - (3) The permittee shall store all waste coatings in containers with tight fitting lids to prevent evaporation loss.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for this emissions unit:
    - a. the name and company identification of each coating, as applied;
    - b. the VOC content of each coating employed, in pounds per gallon, as applied;
    - c. the volume of each coating employed, in gallons, as applied;
    - d. the VOC emissions from each coating employed, in pounds [i.e.,  $d)(1)b. \times d)(1)c.$  for each coating identified in d)(1)a.];
    - e. the VOC emissions from all coatings, in pounds per day [summation of the emissions from d)(1)d. for all coatings identified in d)(1)a.];
    - f. the total volume of all coatings employed, in gallons [i.e., the sum of the volumes recorded in d)(1)c. for all coatings identified in d)(1)a.]; and
    - g. the daily volume-weighted average VOC content for all coatings, in pounds per gallon (average), as applied [i.e., the sum of  $d)(1)b. \times d)(1)c.$  for all the coatings identified in d)(1)a. , divided by d)(1)f.].
  - (2) The permittee shall collect and record the following information each month for this emissions unit:
    - a. the coating usage for each month;

- b. the rolling, 12-month summation of the coating usage figures.
- (3) The permit application for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was used for each pollutant emitted by this emissions unit using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: VM&P Naptha

TLV (ug/m3): 1,400,000

Maximum Hourly Emission Rate (lbs/hr): 12.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 28.9

MAGLC (ug/m3): 33,304

Physical changes to or in the method of operation of the emissions unit after it's 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any daily record showing that the daily volume-weighted average VOC content limitation exceeds the applicable limitation. The notification shall include a copy of such record and shall

be sent to the Southwest Ohio Air Quality Agency within 45 days after the exceedance occurs.

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. All exceedances of the rolling, 12-month coating usage limitation outlined in c)(2).
    - ii. All exceedances of the rolling, 12-month VOC emission limitation outlined in b)(1)b.
    - iii. All exceedances of the rolling, 12-month HAP emission limitation outlined in B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:

Volatile Organic Compound emissions (VOC) shall not exceed 28.4 pounds per hour and 298 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily VOC emission limitations shall be demonstrated by multiplying the hourly or daily usage in gallons per hour by the VOC content in pounds per gallon.



b. Emission Limitation:

Volatile Organic Compound emissions (VOC) shall not exceed 18.3 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping in d)(1).

c. Emission Limitation:

The daily volume weighted average VOC content of all coatings employed in this emissions unit shall not exceed 4.38 pounds of VOC per gallon of coating, as applied.

Applicable Compliance Method:

Compliance with the daily volume weighted average VOC content shall be demonstrated by the recordkeeping in d)(1)g.

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A

(2) Compliance with the usage limitations in c)(1) and c)(2) shall be demonstrated by the recordkeeping required in d)(1) and d)(2), respectively.

g) Miscellaneous Requirements

(1) None.

**2. P004, Special Inks Silk Screen Printing Area**

**Operations, Property and/or Equipment Description:**

Special Inks Silk Screen Printing Area

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound emissions (VOC) shall not exceed 40.0 pounds per day and 1.0 ton per year.  See b)(2)a., c)(1), c)(2) and c)(3).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	See Section B.2.

- (2) Additional Terms and Conditions
  - a. The daily volume weighted average volatile organic compound (VOC) content of all coatings employed in this emissions unit shall not exceed 5.73 pounds of VOC per gallon of coating, as applied.

- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, emissions and VOC content limitations.
- c) Operational Restrictions
  - (1) The maximum daily coating usage for this emissions unit shall not exceed 6.9 gallons per day.
  - (2) The maximum annual coating usage for this emissions unit shall not exceed 350 gallons per year.
  - (3) The permittee shall store all waste coatings in containers with tight fitting lids to prevent evaporation loss.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each day for this emissions unit:
    - a. the name and company identification of each coating, as applied;
    - b. the VOC content of each coating employed, in pounds per gallon, as applied;
    - c. the volume of each coating employed, in gallons;
    - d. the VOC emissions from each coating employed, in pounds [i.e., d)(1)b. x d)(1)c. for each coating identified in d)(1)a.];
    - e. the VOC emissions from all coatings, in pounds per day [summation of the emissions from d)(1)d. for all coatings identified in d)(1)a.];
    - f. the total volume of all coatings employed, in gallons [i.e., the sum of the volumes recorded in d)(1)c. for all coatings identified in d)(1)a.]; and
    - g. the daily volume-weighted average VOC content for all coatings, in pounds per gallon (average), as applied [i.e., the sum of d)(1)b.x d)(1)c. for all the coatings identified in d)(1)a. , divided by d)(1)f.].
- e) Reporting Requirements
  - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified.

Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. HAP emissions limitation outlined in Section B.2.;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

Volatile Organic Compound emissions (VOC) shall not exceed 40.0 pounds per day and 1.0 ton per year.

Applicable Compliance Method:

Compliance with the daily and yearly VOC limitations shall be demonstrated by the record keeping in term and condition d)(1).

b. Emission Limitation:

The daily volume weighted average volatile organic compound (VOC) content of all coatings employed in this emissions unit shall not exceed 5.73 pounds of VOC per gallon of coating, as applied.

Applicable Compliance Method:

Compliance with the daily volume weighted average VOC content limitation shall be demonstrated by the record keeping in term and condition d)(1).

c. Usage Limitation:

The maximum daily coating usage for this emissions unit shall not exceed 6.9 gallons per day.

Applicable Compliance Method:

Compliance with the daily coating usage limitation shall be demonstrated by the record keeping in term and condition d)(1).

d. Usage Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 350 gallons per year.

Applicable Compliance Method:

Compliance with the annual coating usage limitation shall be demonstrated by the record keeping in term and condition d)(1).

- (2) USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

- (1) None.

**3. R001, Roller coating and drying rack operation**

**Operations, Property and/or Equipment Description:**

Roller coating and drying rack operation

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(5).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 193.4 pounds per day including cleanup or 12.0 TPY including cleanup.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See b)(2)b and b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(3)(d)(ii)	See b)(2)d.
c.	<p>OAC rule 3745-31-05(D)</p> <p>Synthetic minor to avoid Title V permitting for HAPs</p>	See Section B.2.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be determined by compliance with the VOC content, material usage and emissions limitations.
- b. The daily volume weighted average volatile organic compound (VOC) content of all coatings employed in this emissions unit shall not exceed 4.0\* pounds of VOC per gallon.

\* The VOC content limits may be exceeded provided the daily and yearly emissions rates are not exceeded.

- c. The VOC content, as applied, of each cleanup material employed shall not exceed 8.15\* pounds of VOC per gallon.

\* The VOC content limits may be exceeded provided the daily and yearly emissions rates are not exceeded.

- d. The volatile organic compound emissions shall be controlled by means of a thermal incinerator that maintains an overall control efficiency of at least 74.1 percent, by weight, in accordance with Permit to Install 14-2185. Permit to Install 14-2185 was originally issued on October 24, 2002 and has been superseded by the terms of this permit to install and operate. The permittee shall operate the thermal incinerator associated with this emission unit at all times during the application of solvent-based coatings to maintain compliance with OAC rule 3745-21-07(M)(3)(d)(ii). However, the permittee shall not be required to operate the thermal incinerator during the application of water-based coatings so long as compliance with the VOC emission limitations specified in b)(1)a. is achieved.

c) Operational Restrictions

- (1) The maximum coating usage in this emissions unit shall not exceed 150 gallons per day and 18,600 gallons per year.

The material usage limitations may be exceeded provided the daily and yearly emission rates are not exceeded.

- (2) The maximum cleanup material usage in this emissions unit shall not exceed 18.0 gallons per day and 2240 gallons per year.

The material usage limitations may be exceeded provided the daily and yearly emission rates are not exceeded.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day:

- a. The name and company identification of each coating, as applied;
- b. The VOC content of each coating employed, as applied, in pounds per gallon;

- c. The volume of each coating employed, in gallons, as applied;
  - d. The VOC emissions from each coating employed, in pounds [i.e.,  $d)(1)b. \times d)(1)c.$ , for each coating identified in  $d)(1)a.$ ]. The control efficiency of the thermal incinerator should be accounted for in this calculation, if applicable;
  - e. The total volume of all coatings employed, in gallons, as applied (i.e., the sum of the volumes recorded in  $d)(1)c.$  for all coatings identified in  $d)(1)a.$ ); and
  - f. The daily volume-weighted average VOC content for all coatings, in pounds per gallon (average), as applied [i.e., the sum of  $d)(1)b. \times d)(1)c.$  for all the coatings identified in  $d)(1)e.$ ]
- (2) The permittee shall collect and record the following information each day:
- a. The name and company identification of each cleanup material employed;
  - b. The VOC content of each cleanup material employed;
  - c. The volume of each cleanup material employed; and
  - d. The VOC emissions from each cleanup material employed, in pounds ( $b \times c$ ).
- (3) The permittee shall maintain monthly records of the coating and cleanup material usage for each month. These records shall be summed at the end of the calendar year to demonstrate compliance with the annual material usage limitations.
- (4) The permittee shall collect and record the following information each day:
- a. The total time period when solvent-based coatings were applied; and
  - b. The total time period when the thermal incinerator was operated.
- (5) The permit to install for this emissions unit, (R001), was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: VM&P Naptha

TLV ( $\mu\text{g}/\text{m}^3$ ): 1,400,000

Maximum Hourly Emission Rate (lbs/hr): 12.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 28.9

MAGLC (ug/m3): 33,304

Physical changes to or in the method of operation of the emissions unit after it's 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01, 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, then the permittee shall obtain a final permit to install prior to the change.

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

A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 193.4 lbs/day and 12.0 TPY, including OC emissions from the use of cleanup materials.

Applicable Compliance Method:

The daily emissions shall be determined by the recordkeeping requirements in d)(1) and d)(2).

The annual emissions shall be determined by totaling the daily emissions in the recordkeeping requirements in d)(1) and d)(2) for the entire year.
  - b. Emission Limitation:

The organic compound emissions shall be controlled by means of a thermal incinerator that maintains an overall control efficiency of at least 74.1 percent, by weight, in accordance with Permit to Install 14-2185.



Applicable Compliance Method:

If required, compliance shall be demonstrated by emissions testing in conformance with U.S. EPA test method 18 and those specified in OAC rule 3745-21-10, or other method(s) with prior approval of Ohio EPA.

c. Usage Limitation:

The maximum coating usage in this emissions unit shall not exceed 150 gallons per day.

The maximum cleanup material usage in this emissions unit shall not exceed 18.0 gallons per day.

Applicable Compliance Method:

Compliance with the daily material usage limitations specified in c)(1) and c)(2) shall be demonstrated by the record keeping in d)(1) and d)(2).

The daily material usage limitations may be exceeded provided the daily emissions rates are not exceeded.

d. Usage Limitation:

The maximum coating usage in this emissions unit shall not exceed 18,600 gallons per year.

The maximum cleanup material usage in this emissions unit shall not exceed 2240 gallons per year.

Applicable Compliance Method:

Compliance with the annual material usage limitations specified in c)(1) and c)(2) shall be demonstrated by the record keeping in c)(3).

The annual material usage limitations may be exceeded provided the yearly emissions rates are not exceeded.

- (2) USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

- (1) None.