

Facility ID: 1667000079 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit K002](#)

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1667000079 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Paint booth #1 - industrial coating of various metal parts	OAC rule 3745-31-05(A)(3) (PTI 16-02267)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09(U).  252 lbs/day volatile organic compounds (VOC) 46.0 tpy VOC  3.5 lbs VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(D)	Combined annual coating input usage rates* and combined annual emissions from all facility emissions units (K001 & K002) shall not exceed the following as rolling, 12-month summations:  49.2 tpy VOC*; 24.5 tpy combined hazardous air pollutants (HAP); and 9.95 tpy individual HAP.  See A.2.a below - A.2.d below.  *Annual VOC input rates equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.  See A.2.e below.
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) The combined annual coating usage input rates and combined annual emissions from the entire facility (K001 & K002) shall not exceed the following as rolling, 12-month summations:
  - i. 49.2 tons of VOC;
  - ii. 24.5 tons of all HAP, combined; and
  - iii. 9.95 tons of any individual HAP.
 The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 tpy for any single HAP and less than 25 tpy for any combination of HAPs, based upon rolling, 12-month summations.

After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the facility-wide coating input rates limitation and VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the applicable coating input rates, and the annual emission limitations, in tons.

The VOC content limitation specified in this applicable rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

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

- a. the company identification of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material (excluding water and exempt solvents), in pounds per gallon; and
- d. the total VOC emission rate for all coatings and cleanup materials, in pounds per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001 & K002:

- a. the name and identification number of each coating, as applied;
- b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
- c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
- d. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
- e. the number of gallons of each coating employed;
- f. the name and identification of each cleanup material employed;
- g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- h. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (g)];
- i. the number of gallons of each cleanup material employed;
- j. the total individual HAP emissions from all coatings and cleanup materials employed, in tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials divided by 2000];
- k. the total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials divided by 2000];
- l. the total VOC emissions from all coatings and cleanup materials employed, in tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (f) times (i) for all of the cleanup materials divided by 2000];
- m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in tons [the sum of C.1.d for the previous 12 calendar months divided by 2000 lbs/ton];
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in tons [the sum of (j) for the previous 12 calendar months]; and
- o. the rolling, 12-month summation of the total combined HAPs emissions from all coatings and cleanup materials employed, in tons [the sum of (k) for the previous 12 calendar months].

3. The permit to install for emissions units K001 & K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: VM&P naphtha  
 TLV (mg/m3): 1370  
 Maximum Hourly Emission Rate (pounds/hour): 16.38  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2893  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 32,619

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (pounds/hour): 16.38  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2893  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: ethyl benzene

TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 16.38  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2893  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: MEK

TLV (mg/m3): 590  
Maximum Hourly Emission Rate (pounds/hour): 5.88  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2545  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047

Pollutant: propanol

TLV (mg/m3): 983  
Maximum Hourly Emission Rate (pounds/hour): 5.88  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2545  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: toluene

TLV (mg/m3): 188  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: isopropyl alcohol

TLV (mg/m3): 983  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 369  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8785

Pollutant: methyl (n-amy)l ketone

TLV (mg/m3): 233  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5547

Pollutant: 1,2,4 trimethyl benzene

TLV (mg/m3): 123  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2927

Pollutant: n-butyl acetate

TLV (mg/m3): 713  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348

Pollutant: n-butyl acetate

TLV (mg/m3): 713  
Maximum Hourly Emission Rate (pounds/hour): 10.5  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

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

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. **Reporting Requirements**
  1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility emission limitations for VOC, individual HAP, and combined HAPs.
  2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily mass emission limitation for VOC, and the actual VOC emissions for each such day.
  3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
  4. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.
  5. The permittee shall submit annual reports that specify the VOC, total HAPs, and individual HAP emissions, in tons, for emissions unit K001 and K002. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. **Testing Requirements**
  1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
 49.2 tpy VOC for entire facility  
 24.5 tpy of total combined HAP for entire facility  
 9.95 tpy of any individual HAP for entire facility  
  
 Applicable Compliance Method:  
  
 Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2.  
  
 USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.  
Emission Limitations:  
 252 lbs/day VOC  
 46.0 tpy VOC  
 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
 Applicable Compliance Methods:  
  
 Compliance with both the daily VOC limitation and VOC content limitation shall be demonstrated based upon the record keeping requirements specified in section C.1.  
  
 Compliance with the annual VOC emission limitation shall be demonstrated by summing the daily VOC emission rates in section C.1.d for 365 calendar days per year and then dividing by 2000 lbs/ton to convert to tons.  
  
 USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
- F. **Miscellaneous Requirements**
  1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1667000079 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
K002 - Paint booth #2 - industrial coating of various metal parts	OAC rule 3745-31-05(A)(3) (PTI 16-02267)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09(U).  17.6 lbs/day volatile organic compounds (VOC) 3.22 tpy VOC  3.0 gallons of coating per day  Combined annual coating input usage rates* and combined annual emissions from all facility emissions units (K001 & K002) shall not exceed the following as rolling, 12-month summations:  49.2 tpy VOC*; 24.5 tpy combined hazardous air pollutants (HAP); and 9.95 tpy individual HAP.  See A.2.a below - A.2.d below.  *Annual VOC input rates equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.  See A.2.e below.
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) The combined annual coating usage input rates and combined annual emissions from the entire facility (K001 & K002) shall not exceed the following as rolling, 12-month summations:
  - i. 49.2 tons of VOC;
  - ii. 24.5 tons of all HAP, combined; and
  - iii. 9.95 tons of any individual HAP.

The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 tpy for any single HAP and less than 25 tpy for any combination of HAPs, based upon rolling, 12-month summations.

After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the facility-wide coating input rates limitation and VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the applicable coating input rates, and the annual emission limitations, in tons.

The coating usage limitation specified in this applicable rule is equivalent to the coating usage limitation established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the spray booth:
  - a. the company identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;

- c. the VOC content of each coating and cleanup material (excluding water and exempt solvents), in pounds per gallon; and
- d. the total VOC emission rate for all coatings and cleanup materials, in pounds per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001 & K002:
  - a. the name and identification number of each coating, as applied;
  - b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
  - c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
  - d. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
  - e. the number of gallons of each coating employed;
  - f. the name and identification of each cleanup material employed;
  - g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - h. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (g)];
  - i. the number of gallons of each cleanup material employed;
  - j. the total individual HAP emissions from all coatings and cleanup materials employed, in tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials divided by 2000];
  - k. the total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials divided by 2000];
  - l. the total VOC emissions from all coatings and cleanup materials employed, in tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials divided by 2000];
  - m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in tons [the sum of C.1.d for the previous 12 calendar months divided by 2000 lbs/ton];
  - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in tons [the sum of (j) for the previous 12 calendar months]; and
  - o. the rolling, 12-month summation of the total combined HAPs emissions from all coatings and cleanup materials employed, in tons [the sum of (k) for the previous 12 calendar months].

3. The permit to install for emissions units K001 & K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: VM&P naphtha  
 TLV (mg/m3): 1370  
 Maximum Hourly Emission Rate (pounds/hour): 16.38  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2893  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 32,619

Pollutant: xylene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 16.38  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2893  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: ethyl benzene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 16.38  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2893  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: MEK  
 TLV (mg/m3): 590  
 Maximum Hourly Emission Rate (pounds/hour): 5.88  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2545  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047  
 Pollutant: propanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (pounds/hour): 5.88  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2545  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: toluene

TLV (mg/m3): 188  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: isopropyl alcohol

TLV (mg/m3): 983  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 369  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8785

Pollutant: methyl (n-amyl) ketone

TLV (mg/m3): 233  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5547

Pollutant: 1,2,4 trimethyl benzene

TLV (mg/m3): 123  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2927

Pollutant: n-butyl acetate

TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348

Pollutant: n-butyl acetate

TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 10.5  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 348  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility emission limitations for VOC, individual HAP, and combined HAPs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily mass

emission limitation for VOC, and the actual VOC emissions for each such day.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
4. The permittee shall notify the Director (the Akron RAQMD) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 45 days after the exceedance occurs.
5. The permittee shall submit annual reports that specify the VOC, total HAPs, and individual HAP emissions, in tons, for emissions units K001 and K002. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:

49.2 tpy VOC for entire facility  
24.5 tpy of total combined HAP for entire facility  
9.95 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitations:

17.6 lbs/day VOC  
3.22 tpy VOC  
3.0 gallons of coating per day

Applicable Compliance Methods:

Compliance with both the daily VOC limitation and coating usage limitation shall be demonstrated based upon the record keeping requirements specified in section C.1.

Compliance with the annual VOC emission limitation shall be demonstrated by summing the daily VOC emission rates in section C.1.d for 365 calendar days per year and then dividing by 2000 lbs/ton to convert to tons.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

1. None