Facility ID: 1677010157 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.

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

Facility ID: 1677010157 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 (EDP Line) miscellaneous metal parts coating line that does not employ volatile organic compound (VOC) controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried with a bake oven. Bake oven is rated at 10 MMBTU/hr and is fired with only natural gas. This facility includes a total of six (6) emissions units, K002 through K007, that are sources of VOC and hazardous air pollutant (HAP) emissions. The facility requested federally enforceable material usage restrictions to limit facility potential emissions of VOCs and HAPs below applicable Title V emission thresholds.	OAC rule 3745-31-05(A)(3) (PTI 16-00203)	The requirements established pursuant to this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-21-08 (B), 3745-21-09(U)(1), and 3745-23-06(B).
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the oven stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	PE from the oven stack shall not exceed 0.020 lb/mmBtu of actual heat input.
	OAC rule 3745-21-08(B)	See A.2.b below.
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-23-06(B)	See A.2.b below.
	OAC rule 3745-35-07(B)	The following annual facility emissions limitations are applicable to K002 through K007, and are based upon a rolling, 12-month summation of the monthly emissions per the federally enforceable material usage restrictions of Part II, Section B: 99 tpy VOCs; 9.0 tpy individual HAPs; and 24 tpy combined HAPs.

2. **Additional Terms and Conditions**

(a) The permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment, operating procedures, or type of fuel burned, or any other change that would increase the potential emissions of any air pollutant.
The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee shall satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the six (6) emissions units in this permit shall not exceed 9.0 tons/year for any single HAP and 24 tons/year for any combination of HAPs. VOC emissions for the six (6) emissions units in this permit are restricted to 99 tons/year. Compliance with the above limitations shall be based upon rolling, 12-month summations of the monthly emissions.

B. **Operational Restrictions**

1. The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 99 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

   *Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

2. The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

   **Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

3. The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions units K002 through K007, combined, shall not exceed 24 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

   ***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

4. The permittee shall use only natural gas as fuel for the bake oven associated with this emissions unit.

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

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

   a. The name and identification number of each coating employed.

   b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

   c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

   d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

      Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: toluene (CAS 108-88-3)
   TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 0.227
Predicted 1-Hour Maximum Ground-Level Concentration at 86 m (ug/m3): 163
MAGLC (ug/m3): 4476

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

4. 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":

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

b. documentation of the 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.

5. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the total VOC material usage and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the VOC content of each coating, as applied, in percent by weight;

e. the VOC content of each cleanup material, as applied, in percent by weight;

f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month total VOC material usage rates of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month total VOC emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

6. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the individual HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month individual HAP material usage rates for each HAP of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month summation individual HAP emissions rates for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

7. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the combined HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the combined HAP content of each coating, as applied, in percent by weight;

e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum [c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rates of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

8. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. **Reporting Requirements**

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the facility annual restricted allowable usage rates (based upon a rolling, 12-month summation of the monthly usage rates) for all VOC & HAP materials employed.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the facility 99 tpy VOCs, 9.0 tpy individual HAPs, and 24 tpy combined HAPs limitations (based upon rolling, 12-month summations of the monthly emissions), as well as the corrective actions that were taken to achieve compliance.

4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

5. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 & A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation: daily, volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall based upon the record keeping requirements specified in Section C.1 of this permit.
Emission Limitation:

PE from the oven stack shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be based upon stack testing per OAC rule 3745-17-03(B)(9).
Emission Limitation:

Visible PE from the oven stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the procedures specified in USEPA Reference Method 9.
Emission Limitations: 99 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.

For Section C.5 above, formulation data shall be used to determine the VOC content of each coating and cleanup material employed.
Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.6 above.

For Section C.6 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating and cleanup material employed.
Emission Limitations: 24 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.7 above.

For Section C.7 above, formulation data shall be used to determine the combined HAP content of each coating and cleanup material employed.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. All terms and conditions of this permit are federally enforceable, except Sections C.2 through C.4

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Facility ID: 1677010157 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control

		Measures
K003 (EDP Pretreat) miscellaneous metal parts coating line that does not employ volatile organic compound (VOC) controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried at less than 200 degrees F. Drying ovens must be less than 10 MMBTU/hr and be fired with only natural gas. This facility includes a total of six (6) emissions units, K002 through K007, that are sources of VOC and hazardous air pollutant (HAP) emissions. The facility requested federally enforceable material usage restrictions to limit facility potential emissions of VOCs and HAPs below applicable Title V emission thresholds.	OAC rule 3745-31-05(A)(3) (PTI 16-02421)	VOC emissions shall not exceed 4.07 pounds per hour and 17.8 tons per year. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1).
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	The following annual facility emissions limitations are applicable to emissions units K002 through K007, and are based upon rolling, 12-month summations of the monthly emissions per the federally enforceable material usage restrictions of Part II, Section B: 99 tpy VOCs; 9.0 tpy individual HAPs; and 24 tpy combined HAPs.

2. **Additional Terms and Conditions**

   (a) The hourly and annual VOC emission limitations above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emission limitations.
   As a way to reduce air emissions, all liquid organic materials shall be properly identified and held in tightly closed containers at all times when not in use or waiting for appropriate off-site disposal.
   The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the six (6) emissions units in this permit shall not exceed 9.0 tons/year for any single HAP and 24 tons/year for any combination of HAPs. VOC emissions for the six (6) emissions units in this permit are restricted to 99 tons/year. Compliance with the above limitations shall be based upon rolling, 12-month summations of the monthly emissions.

B. **Operational Restrictions**

1. The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 99 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

   *Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

2. The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

   **Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

3. The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions units K002 through K007, combined, shall not exceed 24 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

   ***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

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

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

   a. The name and identification number of each coating employed.

   b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

   c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

   d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

      Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: toluene (CAS 108-88-3)
   TLV (ug/m3): 188,000
   Maximum Hourly Emission Rate (lbs/hr): 0.227
   Predicted 1-Hour Maximum Ground-Level Concentration at 86 m (ug/m3): 163
   MAGLC (ug/m3): 4476

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   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.

4. 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 the 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.

5. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the total VOC material usage and emissions:

   a. the name and identification number of each coating and cleanup material employed;

   b. the weight, in pounds per month, of each coating, as applied;

   c. the weight, in pounds per month, of each cleanup material, as applied;

   d. the VOC content of each coating, as applied, in percent by weight;

   e. the VOC content of each cleanup material, as applied, in percent by weight;

   f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

   g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

   h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

   i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

   j. the rolling, 12-month total VOC material usage rate of all coatings and cleanup materials, as applied, in tons per year; and

   k. the rolling, 12-month total VOC emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

6. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the individual HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month individual HAP material usage rate for each HAP from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month individual HAP emissions rate for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

7. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the combined HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the combined HAP content of each coating, as applied, in percent by weight;

e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum [c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rate from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

D. **Reporting Requirements**

1. The permittee shall notify the Director (Akron ARQMD) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Akron ARQMD) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual restricted allowable usage rates (based upon a rolling, 12-month summation of the monthly usage rates) for all VOC & HAP materials employed (for the entire facility).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 99 tpy VOCs, 9.0 tpy individual HAPs, and 24 tpy combined HAPs limitations (based upon rolling, 12-month summations of the monthly emissions), as well as the corrective actions that were taken to achieve compliance (for the entire facility).

4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 & A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation: daily, volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall based upon the record keeping requirements specified in Section C.1 of this permit.

Emissions Limitations: VOC emissions shall not exceed 4.07 pounds per hour and 17.8 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established based on multiplying the maximum hourly coatings usage rate (pounds/hr) by the maximum VOC content (in weight percent) of all the coatings.

if required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Method 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual allowable VOC emissions was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000).
Emission Limitations: 99 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.

For Section C.5 above, formulation data shall be used to determine the VOC content of each coating and cleanup material employed.
Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.6 above.

For Section C.6 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating and cleanup material employed.
Emission Limitations: 24 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.7 above.

For Section C.7 above, formulation data shall be used to determine the combined HAP content of each coating and cleanup material employed.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

   Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

   US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. All terms and conditions of this permit are federally enforceable, except Sections C.2 through C.4.

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

Facility ID: 1677010157 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K004 (EDP Touchup 1) miscellaneous metal parts coating line that does not employ volatile organic compound (VOC) controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried at less than 200 degrees F. Drying ovens must be less than 10 MMBTU/hr and be fired with only natural gas. This facility includes a total of six (6) emissions units, K002 through K007, that are sources of VOC and hazardous air pollutant (HAP) emissions. The facility requested federally enforceable material usage restrictions to limit facility potential emissions of VOCs and HAPs below applicable Title V emission thresholds.	OAC rule 3745-31-05(A)(3) (PTI 16-02421)	VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1). See section B.4.
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	The following annual facility emissions limitations are applicable to emissions units K002 through K007, and are based upon a rolling, 12-month summation of the monthly emissions per the federally enforceable material usage restrictions of Part II, Section B: 99 tpy VOCs; 9.0 tpy individual HAPs; and 24 tpy combined HAPs.

2. **Additional Terms and Conditions**

(a) The hourly and annual VOC emission limitations above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emission limitations. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the six (6) emissions units in this permit shall not exceed 9.0 tons/year for any single HAP and 24 tons/year for any combination of HAPs. VOC emissions for the six (6) emissions units in this permit are restricted to 99 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

B. **Operational Restrictions**

1. The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 99 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

   *Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

2. The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

   **Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

3. The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions units K002 through K007, combined, shall not exceed 24 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

   ***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

4. The permittee shall employ a filtered spray booth exhaust system that effectively controls paint overspray at all times the emissions unit is in operation.

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

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

   a. The name and identification number of each coating employed.

   b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

   c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

   d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: toluene (CAS 108-88-3)
   TLV (ug/m3): 188,000
   Maximum Hourly Emission Rate (lbs/hr): 0.227
   Predicted 1-Hour Maximum Ground-Level Concentration at 86 m (ug/m3): 163
   MAGLC (ug/m3): 4476

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   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.

4. 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 the 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.

5. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the total VOC material usage and emissions:

   a. the name and identification number of each coating and cleanup material employed;

   b. the weight, in pounds per month, of each coating, as applied;

   c. the weight, in pounds per month, of each cleanup material, as applied;

   d. the VOC content of each coating, as applied, in percent by weight;

   e. the VOC content of each cleanup material, as applied, in percent by weight;

   f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

   g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

   h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

   i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

   j. the rolling, 12-month total VOC material usage rate of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month total VOC emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

6. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the individual HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month individual HAP material usage rate for each HAP from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month individual HAP emissions rate for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

7. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the combined HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the combined HAP content of each coating, as applied, in percent by weight;

e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum [c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rate from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

8. The permittee shall maintain daily records that document any time periods when the filtered spray booth exhaust system was not in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall notify the Director (Akron ARQMD) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Akron ARQMD) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual restricted allowable usage rates (based upon a rolling, 12-month summation of the monthly usage rates) for all VOC & HAP materials employed (for the entire facility).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 99 tpy VOCs, 9.0 tpy individual HAPs, and 24 tpy combined HAPs limitations (based upon rolling, 12-month summations of the monthly emissions), as well as the corrective actions that were taken to achieve compliance (for the entire facility).

4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

5. The permittee shall notify the director (Akron RAQMD) in writing of any daily record showing that the filtered spray booth exhaust system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (Akron RAQMD) within 30 days after the event occurs.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 & A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation: daily, volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall based upon the record keeping requirements specified in Section C.1 of this permit.
Emissions Limitation:
VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year.

Applicable Compliance Method: The hourly allowable VOC emission limitation was established based on multiplying the maximum hourly coatings usage rate (pounds/hr) by the maximum VOC content (in weight percent) of all the coatings.

if required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Method 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual allowable VOC emissions was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000).
Emission Limitations: 99 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.

For Section C.5 above, formulation data shall be used to determine the VOC content of each coating and cleanup material employed.
Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.6 above.

For Section C.6 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating and cleanup material employed.
Emission Limitations: 24 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.7 above.

For Section C.7 above, formulation data shall be used to determine the combined HAP content of each coating and cleanup material employed.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. All terms and conditions of this permit are federally enforceable, except Sections C.2 through C.4.

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

Facility ID: 1677010157 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 (EDP Touchup 2) miscellaneous metal parts coating line that does not employ volatile organic compound (VOC) controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried at less than 200 degrees F. Drying ovens must be less than 10 MMBTU/hr and be fired with only natural gas. This facility includes a total of six (6) emissions units, K002 through K007, that are sources of VOC and hazardous air pollutant (HAP) emissions. The facility requested federally enforceable material usage restrictions to limit facility potential emissions of VOCs and HAPs below applicable Title V emission thresholds.	OAC rule 3745-31-05(A)(3) (PTI 16-02421)	VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1). See section B.4.
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	The following annual facility emissions limitations are applicable to emissions units K002 through K007, and are based upon a rolling, 12-month summation of the monthly emissions per the federally enforceable material usage restrictions of Part II, Section B: 99 tpy VOCs; 9.0 tpy individual HAPs; and 24 tpy combined HAPs.

2. **Additional Terms and Conditions**

(a) The hourly and annual VOC emission limitations above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emission limitations. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the six (6) emissions units in this permit shall not exceed 9.0 tons/year for any single HAP and 24 tons/year for any combination of HAPs. VOC emissions for the six (6) emissions units in this permit are restricted to 99 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

B. **Operational Restrictions**

1. The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 99 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

2. The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

**Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

3. The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions units K002 through K007, combined, shall not exceed 24 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

4. The permittee shall employ a filtered spray booth exhaust system that effectively controls paint overspray at all

times the emissions unit is in operation.

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

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

   a. The name and identification number of each coating employed.

   b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

   c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

   d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

      Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: toluene (CAS 108-88-3)
   TLV (ug/m3): 188,000
   Maximum Hourly Emission Rate (lbs/hr): 0.227
   Predicted 1-Hour Maximum Ground-Level Concentration at 86 m (ug/m3): 163
   MAGLC (ug/m3): 4476

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   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.

4. 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 the 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.

5. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the total VOC material usage and emissions:

   a. the name and identification number of each coating and cleanup material employed;

   b. the weight, in pounds per month, of each coating, as applied;

   c. the weight, in pounds per month, of each cleanup material, as applied;

   d. the VOC content of each coating, as applied, in percent by weight;

   e. the VOC content of each cleanup material, as applied, in percent by weight;

   f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month total VOC material usage rate of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month total VOC emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

6. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the individual HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month individual HAP material usage rate for each HAP from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month individual HAP emissions rate for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

7. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the combined HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the combined HAP content of each coating, as applied, in percent by weight;

e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum [c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rate from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

8. The permittee shall maintain daily records that document any time periods when the filtered spray booth exhaust system was not in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall notify the Director (Akron ARQMD) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Akron ARQMD) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual restricted allowable usage rates (based upon a rolling, 12-month summation of the monthly usage rates) for all VOC & HAP materials employed (for the entire facility).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 99 tpy VOCs, 9.0 tpy individual HAPs, and 24 tpy combined HAPs limitations (based upon rolling, 12-month summations of the monthly emissions), as well as the corrective actions that were taken to achieve compliance (for the entire facility).

4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

5. The permittee shall notify the director (Akron RAQMD) in writing of any daily record showing that the filtered spray booth exhaust system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (Akron RAQMD) within 30 days after the event occurs.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 & A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation: daily, volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall based upon the record keeping requirements specified in Section C.1 of this permit.
Emissions Limitation:
VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year.

Applicable Compliance Method: The hourly allowable VOC emission limitation was established based on multiplying the maximum hourly coatings usage rate (pounds/hr) by the maximum VOC content (in weight percent) of all the coatings.

if required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Method 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual allowable VOC emissions was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000).
Emission Limitations: 99 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.

For Section C.5 above, formulation data shall be used to determine the VOC content of each coating and cleanup material employed.
Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.6 above.

For Section C.6 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating and cleanup material employed.
Emission Limitations: 24 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.7 above.

For Section C.7 above, formulation data shall be used to determine the combined HAP content of each coating and cleanup material employed.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. All terms and conditions of this permit are federally enforceable, except Sections C.2 through C.4.

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

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 (Powder Coating Touchup 1) miscellaneous metal parts coating line that does not employ volatile organic compound (VOC) controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried at less than 200 degrees F. Drying ovens must be less than 10 MMBTU/hr and be fired with only natural gas. This facility includes a total of six (6) emissions units, K002 through K007, that are sources of VOC and hazardous air pollutant (HAP) emissions. The facility requested federally enforceable material usage restrictions to limit facility potential emissions of VOCs and HAPs below applicable Title V emission thresholds.	OAC rule 3745-31-05(A)(3) (PTI 16-02421)	VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1). See section B.4.
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	The following annual facility emissions limitations are applicable to emissions units K002 through K007, and are based upon a rolling, 12-month summation of the monthly emissions per the federally enforceable material usage restrictions of Part II, Section B: 99 tpy VOCs; 9.0 tpy individual HAPs; and 24 tpy combined HAPs.

2. **Additional Terms and Conditions**

(a) The hourly and annual VOC emission limitations above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emission limitations. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the six (6) emissions units in this permit shall not exceed 9.0 tons/year for any single HAP and 24 tons/year for any combination of HAPs. VOC emissions for the six (6) emissions units in this permit are restricted to 99 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

B. **Operational Restrictions**

1. The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 99 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

2. The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions

units K002 through K007, combined, shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

**Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

3. The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions units K002 through K007, combined, shall not exceed 24 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

4. The permittee shall employ a filtered spray booth exhaust system that effectively controls paint overspray at all times the emissions unit is in operation.

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

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

a. The name and identification number of each coating employed.

b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene (CAS 108-88-3)
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 0.227
Predicted 1-Hour Maximum Ground-Level Concentration at 86 m (ug/m3): 163
MAGLC (ug/m3): 4476

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.

4. 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 the 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.

5. The permittee shall collect and record the following information each month for the facility (emissions units K002

through K007, combined) to determine the total VOC material usage and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the VOC content of each coating, as applied, in percent by weight;

e. the VOC content of each cleanup material, as applied, in percent by weight;

f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month total VOC material usage rate of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month total VOC emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

6. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the individual HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month individual HAP material usage rate for each HAP from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month individual HAP emissions rate for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

7. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the combined HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the combined HAP content of each coating, as applied, in percent by weight;

e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum [c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rate from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

8. The permittee shall maintain daily records that document any time periods when the filtered spray booth exhaust system was not in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall notify the Director (Akron ARQMD) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Akron ARQMD) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual restricted allowable usage rates (based upon a rolling, 12-month summation of the monthly usage rates) for all VOC & HAP materials employed (for the entire facility).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 99 tpy VOCs, 9.0 tpy individual HAPs, and 24 tpy combined HAPs limitations (based upon rolling, 12-month summations of the monthly emissions), as well as the corrective actions that were taken to achieve compliance (for the entire facility).

4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

5. The permittee shall notify the director (Akron RAQMD) in writing of any daily record showing that the filtered spray booth exhaust system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (Akron RAQMD) within 30 days after the event occurs.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 & A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation: daily, volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall based upon the record keeping requirements specified in Section C.1 of this permit.
Emissions Limitation:
VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year.

Applicable Compliance Method: The hourly allowable VOC emission limitation was established based on multiplying the maximum hourly coatings usage rate (pounds/hr) by the maximum VOC content (in weight percent) of all the coatings.

if required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Method 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual allowable VOC emissions was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000).
Emission Limitations: 99 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.

For Section C.5 above, formulation data shall be used to determine the VOC content of each coating and cleanup material employed.
Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.6 above.

For Section C.6 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating and cleanup material employed.
Emission Limitations: 24 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.7 above.

For Section C.7 above, formulation data shall be used to determine the combined HAP content of each coating and cleanup material employed.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision

statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. All terms and conditions of this permit are federally enforceable, except Sections C.2 through C.4.

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

Facility ID: 1677010157 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K007 (Powder Coating Touchup 2) miscellaneous metal parts coating line that does not employ volatile organic compound (VOC) controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried at less than 200 degrees F. Drying ovens must be less than 10 MMBTU/hr and be fired with only natural gas. This facility includes a total of six (6) emissions units, K002 through K007, that are sources of VOC and hazardous air pollutant (HAP) emissions. The facility requested federally enforceable material usage restrictions to limit facility potential emissions of VOCs and HAPs below applicable Title V emission thresholds.	OAC rule 3745-31-05(A)(3) (PTI 16-02421)	VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1). See section B.4.
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-35-07(B)	The following annual facility emissions limitations are applicable to emissions units K002 through K007, and are based upon a rolling, 12-month summation of the monthly emissions per the federally enforceable material usage restrictions of Part II, Section B: 99 tpy VOCs; 9.0 tpy individual HAPs; and 24 tpy combined HAPs.

2. **Additional Terms and Conditions**

(a) The hourly and annual VOC emission limitations above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emission limitations. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the six (6) emissions units in this permit shall not exceed 9.0

tons/year for any single HAP and 24 tons/year for any combination of HAPs. VOC emissions for the six (6) emissions units in this permit are restricted to 99 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

B. **Operational Restrictions**

1. The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 99 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

   *Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

2. The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions units K002 through K007, combined, shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

   **Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

3. The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions units K002 through K007, combined, shall not exceed 24 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

   ***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

4. The permittee shall employ a filtered spray booth exhaust system that effectively controls paint overspray at all times the emissions unit is in operation.

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

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

   a. The name and identification number of each coating employed.

   b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

   c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

   d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

      Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: toluene (CAS 108-88-3)
   TLV (ug/m3): 188,000
   Maximum Hourly Emission Rate (lbs/hr): 0.227
   Predicted 1-Hour Maximum Ground-Level Concentration at 86 m (ug/m3): 163
   MAGLC (ug/m3): 4476

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   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.

4. 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 the 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.

5. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the total VOC material usage and emissions:

   a. the name and identification number of each coating and cleanup material employed;

   b. the weight, in pounds per month, of each coating, as applied;

   c. the weight, in pounds per month, of each cleanup material, as applied;

   d. the VOC content of each coating, as applied, in percent by weight;

   e. the VOC content of each cleanup material, as applied, in percent by weight;

   f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

   g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

   h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

   i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

   j. the rolling, 12-month total VOC material usage rate of all coatings and cleanup materials, as applied, in tons per year; and

   k. the rolling, 12-month total VOC emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

6. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the individual HAP material usages and emissions:

   a. the name and identification number of each coating and cleanup material employed;

   b. the weight, in pounds per month, of each coating, as applied;

   c. the weight, in pounds per month, of each cleanup material, as applied;

   d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

   e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

   f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

   g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

   h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

   i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

   j. the rolling, 12-month individual HAP material usage rate for each HAP from all coatings and cleanup materials, as applied, in tons per year; and

   k. the rolling, 12-month individual HAP emissions rate for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

7. The permittee shall collect and record the following information each month for the facility (emissions units K002 through K007, combined) to determine the combined HAP material usages and emissions:

   a. the name and identification number of each coating and cleanup material employed;

   b. the weight, in pounds per month, of each coating, as applied;

   c. the weight, in pounds per month, of each cleanup material, as applied;

   d. the combined HAP content of each coating, as applied, in percent by weight;

   e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum [c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rate from all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rate from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

8. The permittee shall maintain daily records that document any time periods when the filtered spray booth exhaust system was not in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall notify the Director (Akron ARQMD) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Akron ARQMD) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the annual restricted allowable usage rates (based upon a rolling, 12-month summation of the monthly usage rates) for all VOC & HAP materials employed (for the entire facility).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the 99 tpy VOCs, 9.0 tpy individual HAPs, and 24 tpy combined HAPs limitations (based upon rolling, 12-month summations of the monthly emissions), as well as the corrective actions that were taken to achieve compliance (for the entire facility).

4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

5. The permittee shall notify the director (Akron RAQMD) in writing of any daily record showing that the filtered spray booth exhaust system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (Akron RAQMD) within 30 days after the event occurs.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 & A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation: daily, volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall based upon the record keeping requirements specified in Section C.1 of this permit.
Emissions Limitation:
VOC emissions shall not exceed 0.883 pound per hour and 3.87 tons per year.

Applicable Compliance Method: The hourly allowable VOC emission limitation was established based on multiplying the maximum hourly coatings usage rate (pounds/hr) by the maximum VOC content (in weight percent) of all the coatings.

if required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Method 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual allowable VOC emissions was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000).
Emission Limitations: 99 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.

For Section C.5 above, formulation data shall be used to determine the VOC content of each coating and cleanup material employed.
Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.6 above.

For Section C.6 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating and cleanup material employed.
Emission Limitations: 24 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (emissions units K002 through K007, combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.7 above.

For Section C.7 above, formulation data shall be used to determine the combined HAP content of each coating and cleanup material employed.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

   Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

   US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. All terms and conditions of this permit are federally enforceable, except Sections C.2 through C.4.