



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 16-1962**

**DATE: October 6, 1999**

Wilkinson Co.  
Michael Ennis  
1530 Commerce Drive  
Stow, OH 44224-1781

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

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

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

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

Very truly yours,

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

cc: USEPA  
AKRON REGIONAL AIR QUALITY MANAGEMENT



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

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**Permit To Install  
Terms and  
Conditions**

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**Issue Date: October 6, 1999  
Effective Date: October 6, 1999**

**FINAL PERMIT TO INSTALL 16-1962**

Application Number: 16-1962  
APS Premise Number: 1677110083  
Permit Fee: **\$1200**  
Name of Facility: Wilkinson Co.  
Person to Contact: Michael Ennis  
Address: 1530 Commerce Drive  
Stow, OH 44224-1781

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1530 Commerce Drive  
Stow, Ohio**

Description of proposed emissions unit(s):  
**TWO SPRAY PAINT BOOTHS, AND A PAINT PREP LINE.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



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Director

Wilkinson Co.  
PTI Application: 16-1962  
October 6, 1999

Facility ID: 1677110083

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds	9.64
Hazardous Air Pollutants	0.92

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Spray Booth #1, manually operated hand spray painting of metal door frames, with an over spray system.	OAC rule 3745-31-05	LIMIT(s) 4.1 pounds/ hour organic compounds.
	OAC rule 3745-35-07	4.92 tons/ year organic compounds. 0.92 ton/year any individual HAP
	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt materials.

**2. Additional Terms and Conditions**

- 2.a The permittee shall properly install and maintain a spray booth exhaust filter system.

**B. Operational Restrictions**

- 1. The maximum hourly usage of coatings, as applied, shall not exceed 1.15 gallons/hr.
- 2. The maximum annual coating usage for this emissions unit shall not exceed 2760 gallons, based on an hourly usage limit of 1.15 gallons per hour, and 2400 hours of operation per year.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
  - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .
2. For the purposes of determining the average hourly emission rate 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 volume, in gallons, of each coating employed;
  - c. The VOC content of each coating, as applied.
  - d. the total volume, in gallons, of all coatings employed;
  - e. the total number of hours the emissions unit was in operation;
  - f. the VOC emission rate in pounds/day, the daily summation (b\*c) ;
  - g. the average hourly VOC emission rate in pounds/hour (f/e);
3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons .

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., having a VOC content greater than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum hourly coating usage limit (1.15 gallons per hour). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line exceeded 4.1 pounds per hour as the hourly emission rate. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

#### **E. Testing Requirements**

1. Compliance with the emission limitations and the operational restrictions in sections A.1, A.2, and B of these terms and conditions shall be determined in accordance with the following methods:
  - a. Operational Restriction:

use of no more than 1.15 gallons of coatings per hour

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed and the number of hours the line was in operation. The average hourly coating usage rate shall be calculated and recorded.

b. Operational Restriction:

The maximum annual coating usage shall not exceed 2760 gallons, based on the 1.15 gallons per hour usage limitation.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the line. The summation of these records shall be used to document compliance with the annual coating usage limitation.

c. Operational Restriction:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

d. Emissions limitation

4.1 pounds/ hour organic compounds.  
4.92 tons/ year organic compounds

Applicable Compliance Method:

Daily records shall be maintained that record the average VOC emission rate in the line.  
The summation of these records shall be used to document compliance with the annual emission limitation.

**F. Miscellaneous Requirements**

None

**PART II: SPECIAL TERMS AND CONDITIONS**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Spray Booth #1, manually operated hand spray painting of metal storage bins, with an over spray system.	OAC rule 3745-31-05	LIMIT(s) 2.5 pounds/ hour organic compounds.
	OAC rule 3745-35-07	1.9 tons/ year organic compounds.
	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt materials.

2. **Additional Terms and Conditions**

- 2.a The permittee shall properly install and maintain a spray booth exhaust filter system.

**B. Operational Restrictions**

1. The maximum hourly usage of coatings, as applied, shall not exceed 1.15 gallons/hr.
2. The maximum annual coating usage for this emissions unit shall not exceed 2760 gallons, based on an hourly usage limit of 1.15 gallons per hour, and 2400 hours of operation per year.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
  - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .
  
2. For the purposes of determining the average hourly emission rate 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 volume, in gallons, of each coating employed;
  - c. The VOC content of each coating, as applied.
  - d. the total volume, in gallons, of all coatings employed;
  - e. the total number of hours the emissions unit was in operation;
  - f. the VOC emission rate in pounds/day, the daily summation (b\*c) ;
  - g. the average hourly VOC emission rate in pounds/hour (f/e);
  
3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons .

**Wilkinson Co.**

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**Octob**

Facility ID: 1677110083

Emissions Unit ID: **K002****D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., having a VOC content greater than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum hourly coating usage limit (1.15 gallons per hour). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line exceeded 4.1 pounds per hour as the hourly emission rate. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restrictions in sections A.1, A.2, and B of these terms and conditions shall be determined in accordance with the following methods:
  - a. Operational Restriction:  
  
use of no more than 1.15 gallons of coatings per hour  
  
Applicable Compliance Method:  
  
Daily records shall be maintained of the daily usage of all coatings employed and the number of hours the line was in operation. The average hourly coating usage rate shall be calculated and recorded.

b. Operational Restriction:

The maximum annual coating usage shall not exceed 2760 gallons, based on the 1.15 gallons per hour usage limitation.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the line. The summation of these records shall be used to document compliance with the annual coating usage limitation.

c. Operational Restriction:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

d. Emissions limitation

4.1 pounds/ hour organic compounds.

4.92 tons/ year organic compounds

Applicable Compliance Method:

Daily records shall be maintained that record the average VOC emission rate in the line. The summation of these records shall be used to document compliance with the annual emission limitation.

**F. Miscellaneous Requirements**

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**Wilkinson Co.**

PTI Application: **16-1062**

**Octob**

Facility ID: **1677110083**

Emissions Unit ID: **K002**

None

**PART II: SPECIAL TERMS AND CONDITIONS**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>Paint Preparation Station, Hand solvent cleaning of metal storage bins using recycled wash-up solvent.</b>	OAC rule 3745-31-05	1.38 pounds/ hour organic compounds.
	OAC rule 3745-35-07	1.66 tons/ year organic compounds.
	OAC rule 3745-21-07	Less stringent than the requirements of OAC rule 3745-31-05 and BAT.

**2. Additional Terms and Conditions**

**2.a**

**B. Operational Restrictions**

1. The emissions unit shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. Solvent wipe rags kept in sealed containers when not in use and/or for proper disposal;

- b. lacquer thinner containers tightly closed when not in use; and,
  - c. Clean only materials that are neither porous nor absorbent.
2. The maximum hourly usage of wiping solvent, as applied, shall not exceed 0.20 gallons/hr.
3. The maximum annual solvent usage from this operation shall not exceed 480 gallons, based on an hourly usage limit of 0.20 gallons per hour, and 2400 hours of operation per year.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the cleaning line:
  - a. the name and identification number of each hand wipe cleaner employed;
  - b. the density of each cleaner, as applied, in pounds per gallon;
  - c. the number of gallons of each cleaner, as applied; and,
  - d. The total VOC emissions from all cleaners employed, in pounds.
  - e. The hours the emissions unit was in operation each month
  - f. The average hourly emission rate based on the monthly usage, in Lbs/hr (d/e).

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the hand wiping operation employs more than the applicable maximum hourly solvent usage limit (0.20 gallons per hour). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the hand wiping operation exceeded 1.38 pounds per hour as the average hourly emission rate. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following method(s):

a. Emission Limitation

1.38 pounds/ hour organic compounds.

1.66 tons/ year organic compounds.

Applicable Compliance Method

$E = \text{Sum of } (C \times D) \text{ for all cleaner formulations employed each month}$

where,

$E =$  monthly VOC emission rate from all cleaner formulations employed each month (lbs/month);

$C =$  monthly usage rate of each cleaner formulation employed each month (gals/month); and

$D =$  density of each cleaner formulation employed each month (lbs/gal).

**F. Miscellaneous Requirements**

None