



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700  
Columbus, Ohio 43215

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P.O. Box 1049  
Columbus, OH 43216-1049

5/6/2009

NICK PAMBOUKIS  
Heritage Fireplace Equipment Co.  
1874 Englewood Avenue  
Akron, OH 44312

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1677010272  
Permit Number: P0104818  
Permit Type: Renewal  
County: Summit

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
Heritage Fireplace Equipment Co.**

Facility ID: 1677010272  
Permit Number: P0104818  
Permit Type: Renewal  
Issued: 5/6/2009  
Effective: 5/6/2009  
Expiration: 5/6/2014





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
 for  
 Heritage Fireplace Equipment Co.

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**Final Permit-to-Install and Operate**  
**Permit Number:** P0104818  
**Facility ID:** 1677010272  
**Effective Date:** 5/6/2009

## Authorization

Facility ID: 1677010272  
Application Number(s): A0037421  
Permit Number: P0104818  
Permit Description: Permit for ten coating application booths  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/6/2009  
Effective Date: 5/6/2009  
Expiration Date: 5/6/2014  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15  
This document constitutes issuance to:

Heritage Fireplace Equipment Co.  
1874 Englewood Ave  
Akron, OH 44312

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104818  
Permit Description: Permit for ten coating application booths

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

**Emissions Unit ID: K005**  
Company Equipment ID: Three Gallon Booth  
Superseded Permit Number: 16-02292  
General Permit Category and Type: Not Applicable

**Emissions Unit ID: K008**  
Company Equipment ID: Smitty Line  
Superseded Permit Number: 16-02292  
General Permit Category and Type: Not Applicable

**Group Name: Cleveland Line & Floor Booth**

<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	Cleveland Line
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	Floor Booth
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable

**Group Name: Heritage Line**

<b>Emissions Unit ID:</b>	<b>K006</b>
Company Equipment ID:	Heritage Booth 1
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	Heritage Booth 2
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable

**Group Name: J Line**

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	J-Line Booth 1
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K012</b>
Company Equipment ID:	J-Line Booth 2
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K013</b>
Company Equipment ID:	J-Line Booth 3
Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K014</b>
Company Equipment ID:	J-Line Booth 4



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Superseded Permit Number:	16-02292
General Permit Category and Type:	Not Applicable



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



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

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

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

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

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

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

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 1.d), 1.e), 1.f), and 1.g).
  - c) The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K005 through K014, combined, shall not exceed 9.9 tpy\*\* for any single HAP and 24.9 tpy\*\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
  - d) The permittee shall collect and record the following information each month for emissions units K005 through K014:
    - (1) the name and identification number of each coating employed;
    - (2) the individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
    - (3) the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from d)(2) above];
    - (4) the number of gallons of each coating employed;
    - (5) the name and identification of each cleanup material employed;
    - (6) the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
    - (7) the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from d)(6) above];
    - (8) the number of gallons of each cleanup material employed;
    - (9) the total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of d)(2) times d)(4) for each coating plus the sum of d)(6) times d)(8) for each cleanup material];



- (10) the total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month [the sum of d)(3) times d)(4) for each coating plus the sum of d)(7) times d)(8) for each cleanup material];
- (11) the rolling, 12-month summation of individual HAP usage\*\* for each HAP, in tons\*\*\*; and
- (12) the rolling, 12-month combined HAPs usage\*\*, in tons\*\*\*.

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

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

\*\*\* This shall include the information for the current month and the preceding eleven calendar months.

- e) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - a. all exceedance of the rolling, 12-month any individual HAP usage for emissions units K005 through K014, combined; and
    - b. all exceedances of the rolling, 12-month combined HAPs usage for emissions units K005 through K014, combined;
  - (2) the probable cause of each deviation (excursion);
  - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - (4) the magnitude and duration of each deviation (excursion).

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

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

- f) The permittee shall also submit annual reports that specify the total individual HAP usage for each HAP and the total combined HAPs usage from emissions units K005 through K014, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.



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- g) Compliance with the emissions limitation(s) in 1.c) above shall be determined in accordance with the following method(s):

- (1) Emission Limitation:

The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K005 through K014, combined, shall not exceed 9.9 tpy for any single HAP and 24.9 tpy for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual individual HAP and combined HAPs usage limitations above shall be demonstrated based on the record keeping requirements established in 1.d) above.



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



**1. K005, Three Gallon Booth**

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

Three Gallon Booth - coating of metal and non-metal parts and assemblies

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 20 lbs/day from this emissions unit.  Volatile organic compound (VOC) emissions shall not exceed 20 lbs/day from coating metal parts.  OC emissions shall not exceed 3.7 tons per year (tpy).  VOC emissions shall not exceed 3.7 tpy.  See b)(2)a. below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U)(2)(e)(ii) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	See 1.c) of Section B – Facility-Wide



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Terms and Conditions.
c.	OAC rule 3745-21-07(G)(2)	<p>On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.</p> <p>The pounds per day emission limitation specified by this rule is less stringent than the pounds per day emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)b. below.</p>
d.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.

(2) Additional Terms and Conditions

- a. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c., d)(2), e)(2)a., and f)(1)a.
- c. The annual OC and VOC emission limitations in b)(1)a. above are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall employ no more than three gallons of coatings in any one day\* when coating metal parts in this emissions unit.

\*Daily usage limitation above shall not apply to coatings employed by this emissions unit on parts or products which are not metal.



d) Monitoring and/or Recordkeeping Requirements

(1) When coating metal parts, the permittee shall collect and record the following information each day for this emissions unit:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume, in gallons, of each coating employed;
- e. the total volume, in gallons, of all of the coatings employed;
- f. the volume, in gallons, of each cleanup material employed; and
- g. the total daily VOC emissions from all coatings, as applied, and cleanup materials, in pounds calculated as below:

Daily VOC emissions = (the sum of d)(1)b. times d)(1)d. for all coatings employed) + (the sum of d)(1)c. times d)(1)f. for all cleanup materials employed).

(2) When employing photochemically reactive material and coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit:

- a. the company identification for each coating and photochemically reactive cleanup material employed;
- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- f. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., d)(2)d./d)(2)e., in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of Aphotochemically reactive@ and Anonphotochemically reactive@ are based upon OAC rule 3745-21-01(C)(5).]



- (3) The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification of each coating and cleanup material employed;
  - b. the OC content of each coating employed, as applied, in pounds per gallon;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the volume, in gallons, of each coating employed;
  - e. the volume, in gallons, of each cleanup material employed; and
  - f. the total daily OC emissions from all coatings, as applied, and cleanup materials, in pounds calculated as below:

$$\text{Daily OC emissions} = (\text{the sum of d)(3)b. times d)(3)d. for all coatings employed}) + (\text{the sum of d)(3)c. times d)(3)e. for all cleanup materials employed}).$$

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
- a. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the average actual hourly OC emissions for each such day;
  - b. an identification of each day during which the daily OC emissions from the coatings and cleanup materials from this emissions unit exceeded 20 pounds per day, and the actual daily OC emissions for each such day; and
  - c. an identification of each day during which the daily VOC emissions, for coating metal parts, from the coatings and cleanup materials from this emissions unit exceeded 20 pounds per day, and the actual daily VOC emissions for each such day.
- (3) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(2) above.

b. Emission Limitation:

OC emissions shall not exceed 20 lbs/day from this emissions unit.

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(3) above.

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

d. Gallons Usage Limitation:

The permittee shall employ no more than three gallons of coatings in any one day when coating metal parts in this emissions unit.

Applicable Compliance Method:

Compliance with the daily gallon usage limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

e. Emission Limitation:

OC emissions shall not exceed 3.7 tpy.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104818

**Facility ID:** 1677010272

**Effective Date:** 5/6/2009

VOC emissions shall not exceed 3.7 tpy.

Applicable Compliance Method:

The annual allowable emission limitations above were determined by multiplying the daily allowable emission limitation by 365 days per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the daily allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g) Miscellaneous Requirements

(1) None.



**2. K008, Smitty Line**

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

Smitty Line (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c)(1), d)(3), e)(2), e)(5), and f)(1)c.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3)	<p>Organic compound (OC) emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).</p> <p>See b)(2)c. below.</p> <p>OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).</p> <p>OC emissions shall not exceed 11 tons per year (tpy) from this emissions unit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>See b)(2)a. and b)(2)b. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-21-07(G)(2), and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D)	<p>The emissions of volatile organic compounds (VOC) shall not exceed 7 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.</p>
c.	OAC rule 3745-21-07(G)(2)	<p>On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.</p> <p>The pounds per day emission limitation specified by this rule is equivalent to the pounds per day emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)d. below.</p>
d.	OAC rule 3745-21-09(U)(1)(c)	<p>The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.</p>

(2) Additional Terms and Conditions

- a. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- b. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM10), carbon monoxide (CO), nitrogen



oxides (NOx), organic compounds (OC), and sulfur dioxide (SO2) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions. The oven associated with this emissions unit is not subject to OAC rule 3745-21-07(G)(1) and/or (G)(3) thru (G)(5).

- c. The daily OC emission limitation, when coatings and cleanup materials employed are not subject to OAC rule 3745-21-07(G)(2), is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c., d)(2), e)(3), and f)(1)a.

c) Operational Restrictions

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

$$C_{VOC,2} = (D_c)(W_{VOC}) / V_s + V_{VOC}$$

where:



$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific @gallons/year@ and/or @tons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) When employing photochemically reactive material and coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit:
- a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
  - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
  - f. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., d)(2)d./d)(2)e., in pounds per hour (average).



[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of Aphotochemically reactive and Anonphotochemically reactive are based upon OAC rule 3745-21-01(C)(5).]

(3) The permittee shall collect and record the following information each month for this emissions unit:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons.
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)c. times d)(3)e. for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from d)(3)f. + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

(4) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
- d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly records showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the



appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month during which the non-complying coatings were used.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 7 tons of VOC per year (VOC input) as a rolling, 12-month summation from coating and cleanup material usage; and
    - ii. 7 tons of VOC per year, based upon a rolling, 12-month summation of the monthly emissions;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
- a. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly OC emissions for coating non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the daily OC emissions for coating non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day.
- (4) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (5) The permittee shall submit annual reports which specify the VOC and OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 or each year.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

- a. Emission Limitation :

On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.

OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the hourly and daily allowable OC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

- b. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

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



c. Emission Limitation:

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

The emissions of VOC shall not exceed 7 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(3) above.

d. Emission Limitation:

OC emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be demonstrated by multiplying the OC content of the "worst-case" coating, in pounds of OC per gallon of coating by the maximum gallons of coating applied per hour times 24 hours per day.

e. Emission Limitation:

OC emissions shall not exceed 11 tpy from this emissions unit.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(4) above.

g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group - Cleveland Line & Floor Booth: K009, K010,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K009	Cleveland Line (existing) - coating of metal and non-metal parts and assemblies, with batch oven shared with emissions unit K010
K010	Floor Booth (existing) - coating of metal and non-metal parts and assemblies, with batch oven shared with emissions unit K009

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), d)(3), e)(2), e)(5), and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3)	Organic compound (OC) emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).  See b)(2)c. below.  OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>OC emissions shall not exceed 15 tons per year (tpy) from emissions units K009 and K010, combined.</p> <p>See b)(2)a. and b)(2)b. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-21-07(G)(2), and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D)	<p>The emissions of volatile organic compounds (VOC) shall not exceed 7 tpy for emissions units K009 and K010, combined, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.</p>
c.	OAC rule 3745-21-07(G)(2)	<p>On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.</p> <p>The pounds per day emission limitation specified by this rule is equivalent to the pounds per day emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)d. below.</p>
d.	OAC rule 3745-21-09(U)(1)(c)	<p>The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.</p>

(2) Additional Terms and Conditions

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



- b. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM10), carbon monoxide (CO), nitrogen oxides (NOx), organic compounds (OC), and sulfur dioxide (SO2) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions. The oven associated with this emissions unit is not subject to OAC rule 3745-21-07(G)(1) and/or (G)(3) thru (G)(5).
- c. The daily OC emission limitation, when coatings and cleanup materials employed are not subject to OAC rule 3745-21-07(G)(2), is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c., d)(2), e)(3), and f)(1)a.

c) Operational Restrictions

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
  - a. the name and identification number of each coating, as applied; and



- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific @gallons/year@ and/or @tons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) When employing photochemically reactive material and coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;



- e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- f. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e.,  $d)(2)d./d)(2)e.$ , in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of  $\Delta$ photochemically reactive $\Delta$  and  $\Delta$ nonphotochemically reactive $\Delta$  are based upon OAC rule 3745-21-01(C)(5).]

- (3) The permittee shall collect and record the following information each month for emissions units K009 and K010, combined:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons;
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of  $d)(3)b.$  times  $d)(3)d.$  for all coatings employed) + (the sum of  $d)(3)c.$  times  $d)(3)e.$  for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from  $d)(3)f.$  + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

- (4) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for emissions units K009 and K010, combined:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallon; and



- d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly records showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month during which the non-complying coatings were used.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. 7 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K009 and K010, combined, from coating and cleanup material usage; and

- ii. 7 tons of VOC per year for emissions units K009 and K010, combined, based upon a rolling, 12-month summation of the monthly emissions;

- b. the probable cause of each deviation (excursion);

- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:

- a. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly OC emissions for coating non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and

- b. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the daily OC emissions for coating



non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day.

- (4) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (5) The permittee shall submit annual reports which specify the VOC and OC emissions from emissions units K009 and K010, combined, for the previous calendar year. These reports shall be submitted by January 31 or each year.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.

OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the hourly and daily allowable OC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related



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

c. Emission Limitation:

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

The emissions of VOC shall not exceed 7 tpy for emissions units K009 and K010, combined, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(3) above.

d. Emission Limitation:

OC emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be demonstrated by multiplying the OC content of the "worst-case" coating, in pounds of OC per gallon of coating by the maximum gallons of coating applied per hour times 24 hours per day.

e. Emission Limitation:

OC emissions shall not exceed 15 tpy from emissions units K009 and K010, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(4) above.

g) Miscellaneous Requirements

- (1) None.



**4. Emissions Unit Group - Heritage Line: K006, K007,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K006	Heritage Line Booth 1 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K007
K007	Heritage Line Booth 2 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K006

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), d)(3), e)(2), e)(5), and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).  See b)(2)c. below.  OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>OC emissions shall not exceed 42.3 tons per year (tpy) from emissions units K006 and K007, combined.</p> <p>See b)(1)a. and b)(1)b. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-21-07(G)(2), and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D)	<p>The emissions of volatile organic compounds (VOC) from emissions units K006 and K007, combined, shall not exceed 28.3 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.</p>
c.	OAC rule 3745-21-07(G)(2)	<p>On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.</p> <p>The pounds per day emission limitation specified by this rule is equivalent to the pounds per day emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)d. below.</p>
d.	OAC rule 3745-21-09(U)(1)(c)	<p>The emission of VOC shall not exceed 3.5 pounds of VOC gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.</p>

(2) Additional Terms and Conditions

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



- b. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM10), carbon monoxide (CO), nitrogen oxides (NOx), organic compounds (OC), and sulfur dioxide (SO2) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions. The oven associated with this emissions unit is not subject to OAC rule 3745-21-07(G)(1) and/or (G)(3) thru (G)(5).
- c. The daily OC emission limitation, when coatings and cleanup materials employed are not subject to OAC rule 3745-21-07(G)(2), is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c., d)(2), e)(3), and f)(1)a.

c) Operational Restrictions

- (1) The permittee shall not employ more than 28.3 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions unit K006 and K007, combined, from coating and cleanup material usage.

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

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
  - a. the name and identification number of each coating, as applied; and



- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific @gallons/year@ and/or @tons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) When employing photochemically reactive material and coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit:
- the company identification for each coating and photochemically reactive cleanup material employed;
  - the number of gallons of each coating and photochemically reactive cleanup material employed;
  - the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;



- e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- f. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e.,  $d)(2)d./d)(2)e.$ , in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of  $\Delta$ photochemically reactive $\Delta$  and  $\Delta$ nonphotochemically reactive $\Delta$  are based upon OAC rule 3745-21-01(C)(5).]

(3) The permittee shall collect and record the following information each month for emissions units K006 and K007, combined:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons;
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of  $d)(3)b.$  times  $d)(3)d.$  for all coatings employed) + (the sum of  $d)(3)c.$  times  $d)(3)e.$  for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from  $d)(3)f.$  + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

(4) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for emissions units K006 and K007, combined:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallon; and



- d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly records showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month during which the non-complying coatings were used.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. 28.3 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions unit K006 and K007, combined, from coating and cleanup material usage; and

- ii. 28.3 tons of VOC per year for emissions units K006 and K007, combined, based upon a rolling, 12-month summation of the monthly;

- b. the probable cause of each deviation (excursion);

- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:

- a. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly OC emissions for coating non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and

- b. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the daily OC emissions for coating



non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day.

- (4) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (5) The permittee shall submit annual reports which specify the VOC and OC emissions from emissions units K006 and K007, combined, for the previous calendar year. These reports shall be submitted by January 31 or each year.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.

OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the hourly and daily allowable OC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related



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

c. Emission Limitation:

The permittee shall not employ more than 28.3 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions unit K006 and K007, combined, from coating and cleanup material usage.

The emissions of VOC from emissions units K006 and K007, combined, shall not exceed 28.3 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(3) above.

d. Emission Limitation:

OC emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be demonstrated by multiplying the OC content of the "worst-case" coating, in pounds of OC per gallon of coating by the maximum gallons of coating applied per hour times 24 hours per day.

e. Emission Limitation:

OC emissions shall not exceed 42.3 tpy from emissions units K006 and K007, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(4) above.

g) Miscellaneous Requirements

- (1) None.



**5. Emissions Unit Group - J Line: K011, K012, K013, K014,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K011	J Line Booth 1 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K012
K012	J Line Booth 2 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K011
K013	J Line Booth 3 (new) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K014
K014	J Line Booth 4 (new) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K013

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), d)(3), e)(2), e)(6) and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).  See b)(2)c. below.  OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).</p> <p>OC emissions shall not exceed 76.8 tons per year (tpy) from emissions units K011, K012, K013, and K014, combined.</p> <p>See b)(2)a. and b)(2)b. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-21-07(G)(2), and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D)	<p>The emissions of volatile organic compounds (VOC) shall not exceed 48.8 tpy for emissions units K011, K012, K013, and K014, combined, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.</p>
c.	OAC rule 3745-21-07(G)(2)	<p>On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.</p> <p>The pounds per day emission limitation specified by this rule is equivalent to the pounds per day emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)d. below.</p>
d.	OAC rule 3745-21-09(U)(1)(c)	<p>The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.</p>



(2) Additional Terms and Conditions

- a. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.
- b. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM10), carbon monoxide (CO), nitrogen oxides (NOx), organic compounds (OC), and sulfur dioxide (SO2) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions. The oven associated with this emissions unit is not subject to OAC rule 3745-21-07(G)(1) and/or (G)(3) thru (G)(5).
- c. The daily OC emission limitation, when coatings and cleanup materials employed are not subject to OAC rule 3745-21-07(G)(2), is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c., d)(2), e)(3), and f)(1)a.

c) Operational Restrictions

- (1) The permittee shall not employ more than 48.8 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K011, K012, K013, and K014, combined from coating and volatile cleanup material usage.

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

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect



and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific @gallons/year@ and/or @tons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) When employing photochemically reactive material and coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;



- c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- f. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e.,  $d)(2)d./d)(2)e.$ , in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of  $\Delta$ photochemically reactive $\Delta$  and  $\Delta$ nonphotochemically reactive $\Delta$  are based upon OAC rule 3745-21-01(C)(5).]

- (3) The permittee shall collect and record the following information each month for emissions units K011, K012, K013, and K014, combined:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons;
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)d. times d)(3)e. for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from d)(3)f. + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

- (4) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for emissions units K011, K012, K013, and K014, combined:

- a. the company identification for each coating and cleanup material employed;



- b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
  - d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.
- (5) The permit to install 16-02292 application for emissions units, K013 and K014, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The  $\Delta$ Toxic Air Contaminant Statute $\text{\textcircled{R}}$ , ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled  $\Delta$ Review of New Sources of Air Toxic Emissions, Option A $\text{\textcircled{R}}$ , as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{R}}$ ; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{R}}$ ; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
  - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
  - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e.,  $\Delta$ X $\text{\textcircled{R}}$  hours per day and  $\Delta$ Y $\text{\textcircled{R}}$  days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/\text{X} \times 5/\text{Y} = 4 \text{ TLV}/\text{XY} = \text{MAGLC}$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m<sup>3</sup>): 75.3

Maximum Hourly Emission Rate (lbs/hr): 12.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 759.7

MAGLC (ug/m<sup>3</sup>): 1793.9

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K013 and K014, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions units K013 and K014, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute 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 a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final federally enforceable permit-to-install and operate (FEPTIO) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute<sup>o</sup>, ORC 3704.03(F):
    - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
    - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute<sup>o</sup>, ORC 3704.03(F);
    - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute<sup>o</sup>, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
    - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute<sup>o</sup>, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
  - (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute<sup>o</sup>, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly records showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month during which the non-complying coatings were used.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. 48.8 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K011, K012, K013, and K014, combined from coating and volatile cleanup material usage; and
      - ii. 48.8 tons of VOC per year for emissions units K011, K012, K013, and K014, combined, based upon a rolling, 12-month summation of the monthly emissions;



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
    - a. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the average hourly OC emissions for coating non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
    - b. an identification of each day during which photochemically reactive materials were employed to coat non-metal parts and the daily OC emissions for coating non-metal parts from the coatings and cleanup materials from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day.
  - (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
  - (5) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (6) The permittee shall submit annual reports which specify the VOC and OC emissions from emissions units K011, K012, K013, and K014, combined, for the previous calendar year. These reports shall be submitted by January 31 or each year.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:



a. Emission Limitation:

On any day the permittee employs any photochemically reactive materials when coating non-metal parts, the OC emissions (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) from coating non-metal parts shall not exceed 8 pounds per hour average from this emissions unit.

OC emissions shall not exceed 40 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials (both non-photochemically and photochemically reactive coating materials, including photochemically reactive cleanup materials) that are subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the hourly and daily allowable OC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

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

c. Emission Limitation:

The permittee shall not employ more than 48.8 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K011, K012, K013, and K014, combined from coating and volatile cleanup material usage.

The emissions of volatile organic compounds (VOC) shall not exceed 48.8 tpy for emissions units K011, K012, K013, and K014, combined, based upon a rolling, 12-month summation of the monthly emissions.



Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(3) above.

d. Emission Limitation:

OC emissions shall not exceed 321.6 lbs/day from this emissions unit when coating non-metal parts employing coatings and cleanup materials that are not subject to OAC rule 3745-21-07(G)(2).

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be demonstrated by multiplying the OC content of the “worst-case” coating, in pounds of OC per gallon of coating by the maximum gallons of coating applied per hour times 24 hours per day.

e. Emission Limitation:

OC emissions shall not exceed 76.8 tpy from emissions units K011, K012, K013, and K014, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(4) above.

g) Miscellaneous Requirements

- (1) None.