

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install PTI NUMBER 01-08016
Diamond Power Specialty

A. Source Description

Diamond Power International, located in Lancaster, Ohio, has submitted a Permit to Install (PTI) application for three coating operations(K001, K002 and K004). This PTI application proposes federally enforceable limits and is intended to work in conjunction with a FESOP in order to effectively restrict the facility’s Potential to Emit (PTE) below those levels which trigger Title V permitting requirements. The above referenced FESOP is for one emissions unit(K005) and is for a coating operation.

Diamond Power International is a manufacturer of boiler related equipment. The coating operations contained in this PTI apply coating to a variety of miscellaneous metal parts.

B. Facility Emissions and Attainment Status

Diamond Power currently has a PTE of more than 100 tons/year of volatile organic compounds, 10 tons per year of any single HAP and 25 tons of total HAP based upon maximum hourly emission rates and 8,760 hours per year of operation. Potential emissions of the remaining criteria are less than 100 tons per year.

C. Source Emissions

Without federally enforceable emission limitations, Diamond Power has potential emissions, based upon 8,760 hours of operation, in excess of 133.37 tons of VOC/year, 51.73 tons of any single HAP/yr, and 51.73 tons of total HAP/yr, as described in Table I.

Table I

Emission Unit	Max Emission Rate of Individual HAP (lb/hr)	Max Emission Rate of VOC (lb/hr)
K001	4.72	10.5
K002	3.77	10.5
K004	3.32	9.45
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PTE (tons/yr) (Based upon 8,760 hours of operation)	51.73	133.37

Note: The values in the above table were derived from an extensive analysis of Diamond Power's emissions which was submitted with the PTI application.

The Ohio EPA and Diamond Power have agreed to monthly emission limits of VOC, individual HAP and total HAP that result in potential emissions of 24.24, 9.9, and 24.49 tons per year, respectively. Table II below describes the monthly VOC emission limitations and resulting PTE.

Table II

Emission Unit	VOC Emission Limit In tons/month
K001	.875
K002	.875
K004	.27
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PTE (tons/yr)	24.24

The monthly limit of individual HAP for the group of emission units K001, K002, and K004 is 0.825, which results in annual emissions of any single HAP of 9.9 tons. The monthly limit of total HAP for the group of emission units K001, K002, and K004 is 2.041 tons, which results in annual total HAP emissions of 24.49. Note: The aforementioned FESOP for emissions unit K005 will result in maximum annual VOC emissions of 3.7 tons from emissions unit K005. The PTE for VOC from all other emission units is 0.91 tons/yr. As a result, Diamond Power's total PTE for VOC will be 28.85 after issuance of the FESOP and this synthetic minor PTI.

D. Conclusion

The operation of the these coating operations in accordance with the terms and conditions of the PTI will result in maximum emission from emissions units K001, K002 and K004 of 24.24 tons of VOC/year, 9.9 tons of individual HAP per year, and 24.49 tons of total HAP per year. Upon issuance of this synthetic minor PTI and the pending FESOP, Diamond Power's potential emissions will therefore fall below those levels which trigger Title V permitting requirements.

The PTI includes federally enforceable limits, monitoring, record keeping, and reporting to ensure continued compliance with the PTI's requirements.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
FAIRFIELD COUNTY
Application No: 01-08016**

CERTIFIED MAIL

DATE: 12/28/2000

Diamond Power Specialty Company
Anthony Klapac
2600 East Main Street
Lancaster, OH 43130

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

CDO

KY



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-08016

Application Number: 01-08016
APS Premise Number: 0123010022
Permit Fee: **To be entered upon final issuance**
Name of Facility: Diamond Power Specialty Company
Person to Contact: Anthony Klapac
Address: 2600 East Main Street
Lancaster, OH 43130

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2600 East Main Street
Lancaster, Ohio**

Description of proposed emissions unit(s):
Synthetic Minor PTI for emission units K001, K002 and K004.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	24.24
Single HAP	9.9
Total HAP	24.5

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray Paint Booth(Machine # 798-799)	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound emissions shall not exceed 10.5 pounds per hour, including emissions from cleanup material. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)
	OAC rule 3745-31-05(D)	Volatile Organic Compound emissions shall not exceed 0.875 ton per month, including emissions from cleanup material.
		Volatile Organic Compound emissions shall not exceed 10.5 tons per year, including emissions from cleanup material.
		See A.2.a-b below
	OAC rule 3745-21-09(U)(1)(c)	Volatile Organic Compound emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water

and exempt solvents, as calculated on a daily volume weighted average basis.

2. Additional Terms and Conditions

- 2.a** The total individual HAP emissions from emission units K001, K002, K004 and K005 shall not exceed 0.825 ton per month.
- 2.b** The total emissions of all HAPs from emission units K001, K002, K004 and K005 shall not exceed 2.041 tons per month.

B. Operational Restrictions

none

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain the following daily records for each surface coating and cleanup material employed in emission unit K001:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$. Note: this record does not need to be maintained on those days in which only coatings with a VOC content of less than 3.5 lbs VOC/gallon, minus water and exempt solvents are employed.
 - d. The number of gallons of each coating and cleanup material employed. Note: The number of gallons of each cleanup material employed shall be calculated by subtracting the amount of recovered clean up material from the amount of cleanup material employed.
 - e. The number of hours of operation
 - f. The total VOC emission rate for all coatings and cleanup material, in pounds per day. i.e., the summation of (b) X (d) for each coating and cleanup material.

3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations: 10.5 lbs VOC/hr, 0.875 ton VOC/month and 10.5 tons VOC/yr

Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

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Issued: To be entered upon final issuance

Emissions Unit ID: **K001**

Emission Limitations: The total individual HAP emissions from emission units K001, K002, K004 and K005 shall not exceed 0.825 ton per month. The total emissions of all HAPs from emission units K001, K002, K004 and K005 shall not exceed 2.041 tons per month.

Applicable Compliance Method: Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitation: Volatile Organic Compound emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this VOC emissions limit in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

F. Miscellaneous Requirements

1. This PTI replaces PTI # 01- 3519, as issued on January 15, 1992, PTI # 01-1479, as issued on January 18, 1987 and PTI # 01-7451, as issued on October 7, 1998.

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Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Spray Paint Booth(Machine # 734)	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound emissions shall not exceed 10.5 pounds per hour, including emissions from cleanup material.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).</p>
	OAC rule 3745-31-05(D)	<p>Volatile Organic Compound emissions shall not exceed 0.875 ton per month, including emissions from cleanup material.</p> <p>Volatile Organic Compound emissions shall not exceed 10.5 tons per year, including emissions from cleanup material.</p>
	OAC rule 3745-21-09(U)(1)(c)	<p>See A.2.a-b below</p> <p>Volatile Organic Compound emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water</p>

Diamond Power Specialty Company
PTI Application 01-00016
Issue

Facility ID: 0123010022

and exempt solvents, as calculated
on a daily volume weighted average
basis.

Emissions Unit ID: **K002**

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Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** The total individual HAP emissions from emission units K001, K002, K004 and K005 shall not exceed 0.825 ton per month.
- 2.b** The total emissions of all HAPs from emission units K001, K002, K004 and K005 shall not exceed 2.041 tons per month.

B. Operational Restrictions

none

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain the following daily records for each surface coating employed in emission unit K002:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$. Note: this record does not need to be maintained on those days in which only coatings with a VOC content of less than 3.5 lbs VOC/gallon, minus water and exempt solvents are employed.
 - d. The number of gallons of each coating and cleanup material employed. Note: The number of gallons of each cleanup material employed shall be calculated by subtracting the amount of recovered clean up material from the amount of cleanup material employed.
 - e. The number of hours of operation
 - f. The total VOC emission rate for all coatings and cleanup material, in pounds per day. i.e., the summation of (b) X (d) for each coating and cleanup material.
 - g. The average hourly emission rate, in pounds per hour i.e., (f) divided by (e).

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Emissions Unit ID: **K002**

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2. The permittee shall also collect and record the following information each month for each coating and cleanup material employed in emission units K002:
 - a. The density of each coating and cleanup material, in pounds per gallon.

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Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

- b. The individual HAP content for each HAP of each coating and cleanup material, in percent by weight , as applied;
 - c. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month; i.e., for each individual HAP, the sum of (a) x (b) multiplied by the respective material usage for each coating and cleanup material.
 - d. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month . i.e., the sum of all individual HAP emissions calculated in (c) above.
3. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.77

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 3,463

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 3.07

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 2,820

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):10333

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a

"modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

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Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which summarize any exceedance of the following: all VOC emission limits and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

Issued: To be entered upon final issuance

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

2. The permittee shall submit annual reports which summarize the following:
 - a. the total VOC emissions from all coatings and cleanup materials employed in emission units K001, K002, K004 and K005, combined and individually;
 - b. the total HAP emissions for each individual HAP and for all combined HAPS from emission units K001, K002, K004 and K005, combined and individually.

The annual reports required by this permit shall be submitted by January 31 of each year.

3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations: 10.5 lbs VOC/hr, 0.875 ton VOC/month and 10.5 tons VOC/yr

Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations: The total individual HAP emissions from emission units K001, K002, K004 and K005 shall not exceed 0.825 ton per month. The total emissions of all HAPs from emission units K001, K002, K004 and K005 shall not exceed 2.041 tons per month.

Applicable Compliance Method: Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitation: Volatile Organic Compound emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Diamond Power Specialty Company

PTI # 01-00010

Issue

Facility ID: 0123010022

Emissions Unit ID: K002

Applicable Compliance Method: Compliance with this VOC emissions limit in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

F. Miscellaneous Requirements

1. This PTI replaces PTI # 01- 3519, as issued on January 15, 1992, PTI # 01-1479, as issued on January 18, 1987 and PTI # 01-7451, as issued on October 7, 1998.

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PTI

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Spray Paint Booth # 4	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound emissions shall not exceed 9.45 pounds per hour, including emissions from cleanup material.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).</p>
	OAC rule 3745-31-05(D)	<p>Volatile Organic Compound emissions shall not exceed 0.27 ton per month, including emissions from cleanup material.</p>
		<p>Volatile Organic Compound emissions shall not exceed 3.27 tons per year, including emissions from cleanup material.</p>
		See A.2.a-b below
OAC rule 3745-21-09(U)(1)(c)	<p>Volatile Organic Compound emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water</p>	

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and exempt solvents, as calculated
on a daily volume weighted average
basis.

Emissions Unit ID: **K004**

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Emissions Unit ID: **K004**

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2. Additional Terms and Conditions

- 2.a** The total individual HAP emissions from emission units K001, K002, K004 and K005 shall not exceed 0.825 ton per month.
- 2.b** The total emissions of all HAPs from emission units K001, K002, K004 and K005 shall not exceed 2.041 tons per month.

B. Operational Restrictions

none

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain the following daily records for each surface coating and cleanup material employed in emission unit K004:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$. Note: this record does not need to be maintained on those days in which only coatings with a VOC content of less than 3.5 lbs VOC/gallon, minus water and exempt solvents are employed.
 - d. The number of gallons of each coating and cleanup material employed. Note: The number of gallons of each cleanup material employed shall be calculated by subtracting the amount of recovered clean up material from the amount of cleanup material employed.
 - e. The number of hours of operation
 - f. The total VOC emission rate for all coatings and cleanup material, in pounds per day. i.e., the summation of (b) X (d) for each coating and cleanup material.
 - g. The average hourly emission rate, in pounds per hour i.e., (f) divided by (e).
- 2. The permittee shall also collect and record the following information each month for each coating

and cleanup material employed in emission units K004:

- a. The density of each coating and cleanup material, in pounds per gallon.
- b. The individual HAP content for each HAP of each coating and cleanup material, in percent by weight , as applied;
- c. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month; i.e., for each individual HAP, the sum of (a) x (b) multiplied by the respective material usage for each coating and cleanup material.
- d. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month . i.e., the sum of all individual HAP emissions calculated in (c) above.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which summarize any exceedance of the following: all VOC emission limits and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

2. The permittee shall submit annual reports which summarize the following:
 - a. the total VOC emissions from all coatings and cleanup materials employed in emission units K001, K002, K004 and K005, combined and individually;
 - b. the total HAP emissions for each individual HAP and for all combined HAPS from emission units K001, K002, K004 and K005, combined and individually.

The annual reports required by this permit shall be submitted by January 31 of each year.

3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.

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Emissions Unit ID: **K004**

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations: 9.45 lbs VOC/hr, 0.27 ton VOC/month and 3.27 tons VOC/yr

Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emissions Unit ID: **K004**

Emission Limitations: The total individual HAP emissions from emission units K001, K002, K004 and K005 shall not exceed 0.825 ton per month. The total emissions of all HAPs from emission units K001, K002, K004 and K005 shall not exceed 2.041 tons per month.

Applicable Compliance Method: Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitation: Volatile Organic Compound emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this VOC emissions limit in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions. u.s. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

F. Miscellaneous Requirements

1. This PTI replaces PTI # 01- 3519, as issued on January 15, 1992, PTI # 01-1479, as issued on January 18, 1987 and PTI # 01-7451, as issued on October 7, 1998.

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION Metal fabrication CITY/TWP Lancaster

SIC CODE 3499 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Spray Paint Booth(Machine # 798-799)

DATE INSTALLED 1/81

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	10.5	10.5	10.5	10.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance w/the permitted emission limits and applicable rules; OAC rule 3745-31-05

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION metal fabrication CITY/TWP Lancaster

Emissions Unit ID: **K004**

SIC CODE 3499 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Spray Paint Booth(Machine # 734)

DATE INSTALLED 8/98

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	10.5	10.5	10.5	10.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance w/the permitted emission limits and applicable rules; OAC rule 3745-31-05

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: see permit

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION Metal Fabrication CITY/TWP Lancaster

SIC CODE 3499 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Spray Paint Booth # 4

DATE INSTALLED 7/96

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.45	3.24	9.45	3.24
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance w/the permitted emission limit and applicable rules; OAC rule 3745-31-05

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES x NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION Metal Fabrication CITY/TWP Lancaster

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

A. General Information

Diamond Power International has submitted a PTI application for three coating operations. This PTI includes federally enforceable terms and conditions so as to restrict Diamond Powers PTE below those levels which trigger Title V permitting requirements.

B. Applicable Rules

At present, Diamond Power has potential emissions greater than those levels which trigger Title V permitting requirements. This PTI restricts emissions to 24.24 tons VOC/yr, 9.9 tons of individual HAP/yr and 24.49 tons total HAP/yr.

These coating operations apply a coating to a metal surface in a quantity greater than 10 gallons per day. As such, the applicable rule is OAC rule 3745-21-09(U)(1). Note: the pound per hour limits are BAT limits.

Only K002 is receiving an increase in allowable emissions and as such compliance with the Air toxics Policy was confirmed. Note that the other emission units were included in this permit for administrative reasons as explained in the attached letter and to streamline the permitting process.

C. Miscellaneous

This permit restricts PTE by limiting emissions on a monthly basis. The proposed emission limits were chosen based upon a very detailed analysis of the actual coating usage and with the intent of permitting this facility at levels just below the Title V thresholds. Given the significant history of actual emissions falling below the critical thresholds, this permit does not contain tables for the initial 12 months of operation. **Note: This facility employs over 19 different coatings**

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION Metal Fabrication CITY/TWP Lancaster

and cleanup materials with a wide range of VOC contents, as such, the often used approach of limiting VOC content and coating usage does not readily lend itself to this specific situation. However, the permit does require that the facility maintain all of the relevant information to determine actual emissions and therefore allow us to positively verify the compliance status of the facility. i.e., the recordkeeping is extensive enough to allow the limits to be enforceable as a practical matter. I have attached calculations to help clarify. Moreover, I have verified the appropriateness of this approach with Mike Hopkins. In addition to recordkeeping, the permit contains all of the applicable reporting requirements to ensure compliance with the permitted emission limits.

Please find attached an Ohio EPA Air Toxics Policy compliance demonstration, which was included as part of the PTI application. Please see the FESOP package submitted to central office for additional information.

D. PTI Fee explanation

K001, K002 and K004 all have process weight rates less than 1000 pounds per hour and operate in SIC code 3499. As a result, the fee for each booth is \$200 and the total fee for the permit is \$600.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

Diamond Power International, located in Lancaster, Ohio, has submitted a Permit to Install (PTI) application for three coating operations(K001, K002 and K004). This PTI application proposes federally enforceable limits and is intended to work in conjunction with a FESOP in order to effectively restrict the facility’s Potential to Emit (PTE) below those levels which trigger Title V permitting requirements. The above referenced FESOP is for one emissions unit(K005) and is for a coating operation.

Diamond Power International is a manufacturer of boiler related equipment. The coating operations contained in this PTI apply coating to a variety of miscellaneous metal parts.

B. Facility Emissions and Attainment Status

Diamond Power currently has a PTE of more than 100 tons/year of volatile organic compounds, 10 tons per year of any single HAP and 25 tons of total HAP based upon maximum hourly emission rates and 8,760 hours per year of operation. Potential emissions of the remaining criteria are less than 100 tons per year.

C. Source Emissions

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION Metal Fabrication CITY/TWP Lancaster

Without federally enforceable emission limitations, Diamond Power has potential emissions, based upon 8,760 hours of operation, in excess of 133.37 tons of VOC/year, 51.73 tons of any single HAP/yr, and 51.73 tons of total HAP/yr, as described in Table I.

Table I

Emission Unit	Max Emission Rate of Individual HAP (lb/hr)	Max Emission Rate of VOC (lb/hr)
K001	4.72	10.5
K002	3.77	10.5
K004	3.32	9.45
<hr/>		
PTE (tons/yr) (Based upon 8,760 hours of operation)	51.73	133.37

Note: The values in the above table were derived from an extensive analysis of Diamond Power's emissions which was submitted with the PTI application.

The Ohio EPA and Diamond Power have agreed to monthly emission limits of VOC, individual HAP and total HAP that result in potential emissions of 24.24, 9.9, and 24.49 tons per year, respectively. Table II below describes the monthly VOC emission limitations and resulting PTE.

Table II

Emission Unit	VOC Emission Limit In tons/month
K001	.875
K002	.875
K004	.27
<hr/>	
PTE (tons/yr)	24.24

The monthly limit of individual HAP for the group of emission units K001, K002, and K004 is 0.825, which results in annual emissions of any single HAP of 9.9 tons. The monthly limit of total HAP for the group of emission units K001, K002, and K004 is 2.041 tons, which results in annual total HAP emissions of 24.49. Note:

NEW SOURCE REVIEW FORM B

PTI Number: 01-08016 Facility ID: 0123010022

FACILITY NAME Diamond Power Specialty Company

FACILITY DESCRIPTION Metal Fabrication CITY/TWP Lancaster

The aforementioned FESOP for emissions unit K005 will result in maximum annual VOC emissions of 3.7 tons from emissions unit K005. The PTE for VOC from all other emission units is 0.91 tons/yr. As a result, Diamond Power's total PTE for VOC will be 28.85 after issuance of the FESOP and this synthetic minor PTI.

D. Conclusion

The operation of the these coating operations in accordance with the terms and conditions of the PTI will result in maximum emission from emissions units K001, K002 and K004 of 24.24 tons of VOC/year, 9.9 tons of individual HAP per year, and 24.49 tons of total HAP per year. Upon issuance of this synthetic minor PTI and the pending FESOP, Diamond Power’s potential emissions will therefore fall below those levels which trigger Title V permitting requirements.

The PTI includes federally enforceable limits, monitoring, record keeping, and reporting to ensure continued compliance with the PTI’s requirements.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	24.24
Single HAP	9.9
Total HAP	24.5