

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: 01-12082

A. Source Description

The applicant, Diamond Power has submitted a PTI application for the Chapter 31 modification of four existing paint operations and one new paint operation. These emissions units were previously permitted under various PTIs. The purpose of the spray booths is to apply various finishes in the manufacturing of industrial boiler equipment.

B. Facility Emissions and Attainment Status

Fairfield County is classified as nonattainment for the 8-hour ozone NAAQS and PM 2.5. Diamond Power is classified as a synthetic minor facility for volatile organic compounds (VOC) and Hazardous Air Pollutants (HAP). Without synthetic minor limitations presented in these permits, potential emissions from the paint operations would trigger Title V permitting and MACT thresholds levels. The facility wide emissions (tons per year), *with the current* synthetic minor limits found in PTI 01-8016 and PTI 01-8177 are:

Diamond Power	VOC (TPY)	Individual HAP (TPY)	Combined HAP (TPY)
TOTAL	27.97	9.9	24.5

C. Source Emissions

Diamond power has proposed emission restrictions that correspond to potential VOC emissions of 46.22 tons per year. Diamond Power has also requested that emissions from emissions units K001, K002, K004, K005 and K006 not exceed 9.9 tons of any single HAP and 24.5 tons of all HAP.

Limiting emissions results in Diamond Power having a PTE below those levels which trigger Title V and or MACT permitting requirements.

D. Conclusion

The permit contains operational restrictions, record keeping and reporting requirements to ensure on going compliance with the emission limitations. Diamond Power will remain a synthetic minor facility. Emissions of any single HAP will not exceed 9.9 tons and total HAP emissions will not exceed 24.5 tons per year. The synthetic minor will effectively restrict the volatile organic compounds and hazardous air pollutant emissions below Title V and MACT levels. Therefore, the federally enforceable limits included in the proposed PTI will allow Diamond Power to avoid MACT requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
FAIRFIELD COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

**Application No: 01-12082
Fac ID: 0123010022**

DATE: 10/19/2006

Diamond Power Specialty Company
Philip Vonderwell
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 **\$1000** 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

KY

FAIRFIELD COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-12082 FOR AN AIR CONTAMINANT SOURCE FOR
Diamond Power Specialty Company**

On 10/19/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Diamond Power Specialty Company**, located at **2600 East Main Street, Lancaster, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12082:

Surface coating operations.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**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 01-12082

Application Number: 01-12082
Facility ID: 0123010022
Permit Fee: **To be entered upon final issuance**
Name of Facility: Diamond Power Specialty Company
Person to Contact: Philip Vonderwell
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):
Surface coating operations.

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

Diamond Power Specialty Company
PTI Application: 01-12082
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0123010022

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

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,

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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

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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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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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 ninety (90) 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	46.22
Individual HAP	9.9
Combined HAPs	24.5
PM	12.1

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K001) - 1949 paint Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.</p> <p>The requirements of this rule include compliance with the requirements of OAC rules 3745-21-09(U), 3745-35-07(B), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-21-09(U)(1)(c)	<p>3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.</p>
OAC rule 3745-35-07(B) (synthetic minor to avoid MACT and Title V)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons per rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons per rolling, 12-month period.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-11(B)	<p>Particulate emissions (PE) shall not exceed 0.551 lb/hr.</p>
OAC rule 3745-17-07(A)	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>

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Facility ID: 0123010022

Emissions Unit ID: K001

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2. Additional Terms and Conditions

- 2.a** The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.
- 2.b** The following spray guns may be used in this spray booth: air gun, airless, air assisted airless, high volume low pressure(HVLP), or any application method that achieves at least a 75 percent transfer efficiency. However, only one is permitted to be in use at any given time.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B)(1).

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum amount of annual coating usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 25,269 gallons, based upon a rolling, 12-month summation of coating usage figures.
- 3. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual thinner and cleanup material usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 500 gallons, based upon a rolling, 12-month summation of usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K001:
 - a. the company identification for each coating and cleanup material employed;

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- b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each day for emissions unit K001:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - 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 $C_{VOC,2}$.
3. The permittee shall collect and record the following information each month:
- a. the name and identification of each material employed by emissions units K001, K002, K004, K005 and K006;
 - b. the VOC content for each material employed by emissions units K001, K002, K004, K005 and K006, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material employed by emissions units K001, K002, K004, K005 and K006;
 - d. the rolling, 12-month summation of the material usage for emissions units K001, K002, K004, K005 and K006, in gallons; and
 - e. the total VOC emissions from all materials employed by emissions units K001, K002, K004, K005 and K006, in tons per rolling, 12-month period.

Emissions Unit ID: **K001**

4. The permittee shall collect and record the following information for emissions units K001, K002, K004, K005 and K006 on a monthly basis:
 - a. the name and identification of each coating, thinner, and cleanup material employed;
 - b. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and
 - e. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.
5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K004, K005 and K006 for the purpose of determining compliance with the rolling, 12-month emission limitations:
 - a. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and
 - b. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.
6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
7. The permit to install for emissions units K001, K002, K004, K005 and K006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-PRIME model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-PRIME (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: **Xylene**

TLV (mg/m³): **434**

Maximum Hourly Emission Rate (lbs/hr): **7.25**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³):**69**

MAGLC (ug/m³): **10,339**

Pollutant: **Toluene**

TLV (mg/m³): **188**

Maximum Hourly Emission Rate (lbs/hr): **8.24**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): **69**

MAGLC (ug/m³): **4,486**

Pollutant: **Ethyl Benzene**

TLV (mg/m³): **434**

Maximum Hourly Emission Rate (lbs/hr): **2.17**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³):**23**

MAGLC (ug/m³): **10,338**

Pollutant: **MIBK**

TLV (mg/m³): **205**

Maximum Hourly Emission Rate (lbs/hr): **1.83**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): **19**

MAGLC (ug/m³): **4,887**

Pollutant: **Aliphatic Hydrocarbon**

TLV (mg/m³): **1,399**

Maximum Hourly Emission Rate (lbs/hr): **7.41**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): **79**

MAGLC (ug/m³): **33,304**

Pollutant: **Stoddard Solvent**

TLV (mg/m³): **572**

Maximum Hourly Emission Rate (lbs/hr): **12.21**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): **130**

MAGLC (ug/m³): **13,633**

Pollutant: **Ethyl Acetate**

TLV (mg/m³): **1,440**

Maximum Hourly Emission Rate (lbs/hr): **11.08**

Emissions Unit ID: **K001**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **118**
MAGLC (ug/m3): **34,317**

Pollutant: **Isopropanol**TLV (mg/m3): **490**Maximum Hourly Emission Rate (lbs/hr): **1.71**Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**MAGLC (ug/m3): **11,703**Pollutant: **Methyl Propyl Ketone**TLV (mg/m3): **705**Maximum Hourly Emission Rate (lbs/hr): **2.47**Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**MAGLC (ug/m3): **16,783**

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above

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changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing the use of noncomplying coatings (i.e., an exceedance of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following limitations:
 - a. the rolling, 12-month coating usage limitation (25,269 gallons);
 - b. the rolling, 12-month thinner and cleanup material usage limitation (500 gallons);
 - c. the rolling, 12-month VOC emission limitation (46.22 tons);
 - d. the rolling, 12-month individual HAP emission limitation (9.9 tons); and
 - e. the rolling, 12-month total combined HAP emission limitation (24.5 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

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

Emissions Unit ID: **K001**

- 1.a Emission Limitation: 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.2.c U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation: Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.c Emissions Limitation: Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound PM per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.d Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.3.e above.

- 1.e Emission Limitations: Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons/rolling, 12-month period. Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with these HAP emission limitations shall

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be demonstrated through the monthly records required in Sections C.5.a and C.5.b above.

- 1.f Emission Limitation: The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1.c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.g Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.1.f above.

F. Miscellaneous Requirements

1. The terms of this permit supercede those identified in PTI No. 01-8016, as issued on January 13, 2005.
2. The terms and conditions of this emission unit, A.1 through E.1, are federally enforceable.

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.

Operations, Property, and/or Equipment - (K002) - 1979 Paint Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.</p> <p>The requirements of this rule include compliance with the requirements of OAC rules 3745-21-09(U), 3745-35-07(B), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.
OAC rule 3745-35-07(B) (synthetic minor to avoid MACT and Title V)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons per rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons per rolling, 12-month period.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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2. Additional Terms and Conditions

- 2.a** The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.
- 2.b** The following spray guns may be used in this spray booth: air gun, airless, air assisted airless, high volume low pressure(HVLP), or any application method that achieves at least a 75 percent transfer efficiency. However, only one is permitted to be in use at any given time.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B)(1).

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum amount of annual coating usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 25,269 gallons, based upon a rolling, 12-month summation of coating usage figures.
- 3. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual thinner and cleanup material usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 500 gallons, based upon a rolling, 12-month summation of usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K002:
 - a. the company identification for each coating and cleanup material employed;

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- b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each day for emissions unit K002:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - 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 $C_{VOC,2}$.
3. The permittee shall collect and record the following information each month:
- a. the name and identification of each material employed by emissions units K001, K002, K004, K005 and K006;
 - b. the VOC content for each material employed by emissions units K001, K002, K004, K005 and K006, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material employed by emissions units K001, K002, K004, K005 and K006;
 - d. the rolling, 12-month summation of the material usage for emissions units K001, K002, K004, K005 and K006, in gallons; and
 - e. the total VOC emissions from all materials employed by emissions units K001, K002, K004, K005 and K006, in tons per rolling, 12-month period.
4. The permittee shall collect and record the following information for emissions units

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K001, K002, K004, K005 and K006 on a monthly basis:

- a. the name and identification of each coating, thinner, and cleanup material employed;
 - b. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and
 - e. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.
5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K004, K005 and K006 for the purpose of determining compliance with the rolling, 12-month emission limitations:
- a. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and
 - b. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.
6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
7. The permit to install for emissions units K001, K002, K004, K005 and K006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-PRIME model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-PRIME (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: **Xylene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **7.25**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **10,339**

Pollutant: **Toluene**

TLV (mg/m3): **188**

Maximum Hourly Emission Rate (lbs/hr): **8.24**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **4,486**

Pollutant: **Ethyl Benzene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **2.17**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **23**

MAGLC (ug/m3): **10,338**

Pollutant: **MIBK**

TLV (mg/m3): **205**

Maximum Hourly Emission Rate (lbs/hr): **1.83**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **19**

MAGLC (ug/m3): **4,887**

Pollutant: **Aliphatic Hydrocarbon**

TLV (mg/m3): **1,399**

Maximum Hourly Emission Rate (lbs/hr): **7.41**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **79**

MAGLC (ug/m3): **33,304**

Pollutant: **Stoddard Solvent**

TLV (mg/m3): **572**

Maximum Hourly Emission Rate (lbs/hr): **12.21**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **130**

MAGLC (ug/m3): **13,633**

Pollutant: **Ethyl Acetate**

TLV (mg/m3): **1,440**

Maximum Hourly Emission Rate (lbs/hr): **11.08**

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **118**

MAGLC (ug/m3): **34,317**

Pollutant: **Isopropanol**

TLV (mg/m3): **490**

Maximum Hourly Emission Rate (lbs/hr): **1.71**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**

MAGLC (ug/m3): **11,703**

Pollutant: **Methyl Propyl Ketone**

TLV (mg/m3): **705**

Maximum Hourly Emission Rate (lbs/hr): **2.47**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**

MAGLC (ug/m3): **16,783**

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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9. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing the use of noncomplying coatings (i.e., an exceedance of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following limitations:
 - a. the rolling, 12-month coating usage limitation (25,269 gallons);
 - b. the rolling, 12-month thinner and cleanup material usage limitation (500 gallons);
 - c. the rolling, 12-month VOC emission limitation (46.22 tons);
 - d. the rolling, 12-month individual HAP emission limitation (9.9 tons); and
 - e. the rolling, 12-month total combined HAP emission limitation (24.5 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

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

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- 1.a Emission Limitation: 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.2.c U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation: Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.c Emissions Limitation: Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound PM per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.d Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.3.e above.

- 1.e Emission Limitations: Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons/rolling, 12-month period. Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with these HAP emission limitations shall

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be demonstrated through the monthly records required in Sections C.5.a and C.5.b above.

- 1.f Emission Limitation: The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1.c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.g Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.1.f above.

F. Miscellaneous Requirements

1. The terms of this permit supercede those identified in PTI No. 01-8016, as issued on January 13, 2005.
2. The terms and conditions of this emission unit, A.1 through E.1, are federally enforceable.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K004) - ASH Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.</p> <p>The requirements of this rule include compliance with the requirements of OAC rules 3745-21-09(U), 3745-35-07(B), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-21-09(U)(1)(c)	<p>3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.</p>
OAC rule 3745-35-07(B) (synthetic minor to avoid MACT and Title V)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons per rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons per rolling, 12-month period.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-11(B)	<p>Particulate emissions (PE) shall not exceed 0.551 lb/hr.</p>
OAC rule 3745-17-07(A)	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>

Emissions Unit ID: **K004****2. Additional Terms and Conditions**

- 2.a** The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.
- 2.b** The following spray guns may be used in this spray booth: air gun, airless, air assisted airless, high volume low pressure(HVLP), or any application method that achieves at least a 75 percent transfer efficiency. However, only one is permitted to be in use at any given time.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B)(1).

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum amount of annual coating usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 25,269 gallons, based upon a rolling, 12-month summation of coating usage figures.
- 3. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual thinner and cleanup material usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 500 gallons, based upon a rolling, 12-month summation of usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K004:
 - a. the company identification for each coating and cleanup material employed;

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- b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each day for emissions unit K004:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - 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 $C_{VOC,2}$.
3. The permittee shall collect and record the following information each month:
- a. the name and identification of each material employed by emissions units K001, K002, K004, K005 and K006;
 - b. the VOC content for each material employed by emissions units K001, K002, K004, K005 and K006, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material employed by emissions units K001, K002, K004, K005 and K006;
 - d. the rolling, 12-month summation of the material usage for emissions units K001, K002, K004, K005 and K006, in gallons; and
 - e. the total VOC emissions from all materials employed by emissions units K001, K002, K004, K005 and K006, in tons per rolling, 12-month period.

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4. The permittee shall collect and record the following information for emissions units K001, K002, K004, K005 and K006 on a monthly basis:
 - a. the name and identification of each coating, thinner, and cleanup material employed;
 - b. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and
 - e. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K004, K005 and K006 for the purpose of determining compliance with the rolling, 12-month emission limitations:
 - a. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and
 - b. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.

6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

7. The permit to install for emissions units K001, K002, K004, K005 and K006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-PRIME model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-PRIME (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the

"worst case" pollutant(s):

Pollutant: **Xylene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **7.25**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **10,339**

Pollutant: **Toluene**

TLV (mg/m3): **188**

Maximum Hourly Emission Rate (lbs/hr): **8.24**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **4,486**

Pollutant: **Ethyl Benzene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **2.17**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **23**

MAGLC (ug/m3): **10,338**

Pollutant: **MIBK**

TLV (mg/m3): **205**

Maximum Hourly Emission Rate (lbs/hr): **1.83**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **19**

MAGLC (ug/m3): **4,887**

Pollutant: **Aliphatic Hydrocarbon**

TLV (mg/m3): **1,399**

Maximum Hourly Emission Rate (lbs/hr): **7.41**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **79**

MAGLC (ug/m3): **33,304**

Pollutant: **Stoddard Solvent**

TLV (mg/m3): **572**

Maximum Hourly Emission Rate (lbs/hr): **12.21**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **130**

MAGLC (ug/m3): **13,633**

Pollutant: **Ethyl Acetate**

TLV (mg/m3): **1,440**

Maximum Hourly Emission Rate (lbs/hr): **11.08**

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **118**

MAGLC (ug/m3): **34,317**

Pollutant: **Isopropanol**

TLV (mg/m3): **490**

Maximum Hourly Emission Rate (lbs/hr): **1.71**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**

MAGLC (ug/m3): **11,703**

Pollutant: **Methyl Propyl Ketone**

TLV (mg/m3): **705**

Maximum Hourly Emission Rate (lbs/hr): **2.47**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**

MAGLC (ug/m3): **16,783**

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

Emissions Unit ID: **K004**

9. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing the use of noncomplying coatings (i.e., an exceedance of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following limitations:
 - a. the rolling, 12-month coating usage limitation (25,269 gallons);
 - b. the rolling, 12-month thinner and cleanup material usage limitation (500 gallons);
 - c. the rolling, 12-month VOC emission limitation (46.22 tons);
 - d. the rolling, 12-month individual HAP emission limitation (9.9 tons); and
 - e. the rolling, 12-month total combined HAP emission limitation (24.5 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

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

Emissions Unit ID: **K004**

- 1.a Emission Limitation: 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.2.c U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation: Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.c Emissions Limitation: Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound PM per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.d Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.3.e above.

- 1.e Emission Limitations: Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons/rolling, 12-month period. Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with these HAP emission limitations shall

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be demonstrated through the monthly records required in Sections C.5.a and C.5.b above.

- 1.f Emission Limitation: The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1.c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.g Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.1.f above.

F. Miscellaneous Requirements

1. The terms of this permit supercede those identified in PTI No. 01-8016, as issued on January 13, 2005.
2. The terms and conditions of this emission unit, A.1 through E.1, are federally enforceable.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K005) - 2000 Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.</p> <p>The requirements of this rule include compliance with the requirements of OAC rules 3745-21-09(U), 3745-35-07(B), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-21-09(U)(1)(c)	<p>3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.</p>
OAC rule 3745-35-07(B) (synthetic minor to avoid MACT and Title V)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons per rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons per rolling, 12-month period.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-11(B)	<p>Particulate emissions (PE) shall not exceed 0.551 lb/hr.</p>
OAC rule 3745-17-07(A)	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>

2. Additional Terms and Conditions

- 2.a** The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.
- 2.b** The following spray guns may be used in this spray booth: air gun, airless, air assisted airless, high volume low pressure(HVLP), or any application method that achieves at least a 75 percent transfer efficiency. However, only one is permitted to be in use at any given time.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B)(1).

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum amount of annual coating usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 25,269 gallons, based upon a rolling, 12-month summation of coating usage figures.
- 3. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual thinner and cleanup material usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 500 gallons, based upon a rolling, 12-month summation of usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K005:
 - a. the company identification for each coating and cleanup material employed;

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- b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each day for emissions unit K005:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - 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 $C_{VOC,2}$.
3. The permittee shall collect and record the following information each month:
- a. the name and identification of each material employed by emissions units K001, K002, K004, K005 and K006;
 - b. the VOC content for each material employed by emissions units K001, K002, K004, K005 and K006, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material employed by emissions units K001, K002, K004, K005 and K006;
 - d. the rolling, 12-month summation of the material usage for emissions units K001, K002, K004, K005 and K006, in gallons; and
 - e. the total VOC emissions from all materials employed by emissions units K001, K002, K004, K005 and K006, in tons per rolling, 12-month period.

Emissions Unit ID: **K005**

4. The permittee shall collect and record the following information for emissions units K001, K002, K004, K005 and K006 on a monthly basis:
 - a. the name and identification of each coating, thinner, and cleanup material employed;
 - b. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and
 - e. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K004, K005 and K006 for the purpose of determining compliance with the rolling, 12-month emission limitations:
 - a. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and
 - b. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.

6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

7. The permit to install for emissions units K001, K002, K004, K005 and K006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-PRIME model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-PRIME (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the

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"worst case" pollutant(s):

Pollutant: **Xylene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **7.25**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**69**

MAGLC (ug/m3): **10,339**

Pollutant: **Toluene**

TLV (mg/m3): **188**

Maximum Hourly Emission Rate (lbs/hr): **8.24**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **4,486**

Pollutant: **Ethyl Benzene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **2.17**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**23**

MAGLC (ug/m3): **10,338**

Pollutant: **MIBK**

TLV (mg/m3): **205**

Maximum Hourly Emission Rate (lbs/hr): **1.83**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **19**

MAGLC (ug/m3): **4,887**

Pollutant: **Aliphatic Hydrocarbon**

TLV (mg/m3): **1,399**

Maximum Hourly Emission Rate (lbs/hr): **7.41**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **79**

MAGLC (ug/m3): **33,304**

Pollutant: **Stoddard Solvent**

TLV (mg/m3): **572**

Maximum Hourly Emission Rate (lbs/hr): **12.21**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **130**

MAGLC (ug/m3): **13,633**

Pollutant: **Ethyl Acetate**

TLV (mg/m3): **1,440**

Emissions Unit ID: **K005**

Maximum Hourly Emission Rate (lbs/hr): **11.08**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **118**
MAGLC (ug/m3): **34,317**

Pollutant: **Isopropanol**TLV (mg/m3): **490**

Maximum Hourly Emission Rate (lbs/hr): **1.71**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**
MAGLC (ug/m3): **11,703**

Pollutant: **Methyl Propyl Ketone**TLV (mg/m3): **705**

Maximum Hourly Emission Rate (lbs/hr): **2.47**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**
MAGLC (ug/m3): **16,783**

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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9. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing the use of noncomplying coatings (i.e., an exceedance of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following limitations:
 - a. the rolling, 12-month coating usage limitation (25,269 gallons);
 - b. the rolling, 12-month thinner and cleanup material usage limitation (500 gallons);
 - c. the rolling, 12-month VOC emission limitation (46.22 tons);
 - d. the rolling, 12-month individual HAP emission limitation (9.9 tons); and
 - e. the rolling, 12-month total combined HAP emission limitation (24.5 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

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

Emissions Unit ID: **K005**

- 1.a Emission Limitation: 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.2.c U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation: Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.c Emissions Limitation: Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound PM per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.d Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.3.e above.

- 1.e Emission Limitations: Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons/rolling, 12-month period. Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with these HAP emission limitations shall

Emissions Unit ID: **K005**

be demonstrated through the monthly records required in Sections C.5.a and C.5.b above.

- 1.f Emission Limitation: The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1.c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.g Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.1.f above.

F. Miscellaneous Requirements

1. The terms of this permit supercede those identified in PTI No. 01-8177, as issued on June 21, 2000.
2. The terms and conditions of this emission unit, A.1 through E.1, are federally enforceable.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K006) - 2006 Paint Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.</p> <p>The requirements of this rule include compliance with the requirements of OAC rules 3745-21-09(U), 3745-35-07(B), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-21-09(U)(1)(c)	<p>3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.</p>
OAC rule 3745-35-07(B) (synthetic minor to avoid MACT and Title V)	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons per rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons per rolling, 12-month period.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-11(B)	<p>Particulate emissions (PE) shall not exceed 0.551 lb/hr.</p>
OAC rule 3745-17-07(A)	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>

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Emissions Unit ID: **K006**

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2. Additional Terms and Conditions

- 2.a** The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.
- 2.b** The following spray guns may be used in this spray booth: air gun, airless, air assisted airless, high volume low pressure(HVLP), or any application method that achieves at least a 75 percent transfer efficiency. However, only one is permitted to be in use at any given time.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B)(1).

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum amount of annual coating usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 25,269 gallons, based upon a rolling, 12-month summation of coating usage figures.
- 3. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual thinner and cleanup material usage for emissions units K001, K002, K004, K005 and K006 shall not exceed 500 gallons, based upon a rolling, 12-month summation of usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K006:

Emissions Unit ID: **K006**

- 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 VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each day for emissions unit K006:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - 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 $C_{VOC,2}$.
3. The permittee shall collect and record the following information each month:
- a. the name and identification of each material employed by emissions units K001, K002, K004, K005 and K006;
 - b. the VOC content for each material employed by emissions units K001, K002, K004, K005 and K006, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material employed by emissions units K001, K002, K004, K005 and K006;
 - d. the rolling, 12-month summation of the material usage for emissions units K001, K002, K004, K005 and K006, in gallons; and
 - e. the total VOC emissions from all materials employed by emissions units K001, K002, K004, K005 and K006, in tons per rolling, 12-month period.

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4. The permittee shall collect and record the following information for emissions units K001, K002, K004, K005 and K006 on a monthly basis:
 - a. the name and identification of each coating, thinner, and cleanup material employed;
 - b. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and
 - e. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K004, K005 and K006 for the purpose of determining compliance with the rolling, 12-month emission limitations:
 - a. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and
 - b. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.

6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

7. The permit to install for emissions units K001, K002, K004, K005 and K006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-PRIME model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-PRIME (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in

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Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: **Xylene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **7.25**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **10,339**

Pollutant: **Toluene**

TLV (mg/m3): **188**

Maximum Hourly Emission Rate (lbs/hr): **8.24**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **69**

MAGLC (ug/m3): **4,486**

Pollutant: **Ethyl Benzene**

TLV (mg/m3): **434**

Maximum Hourly Emission Rate (lbs/hr): **2.17**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **23**

MAGLC (ug/m3): **10,338**

Pollutant: **MIBK**

TLV (mg/m3): **205**

Maximum Hourly Emission Rate (lbs/hr): **1.83**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **19**

MAGLC (ug/m3): **4,887**

Pollutant: **Aliphatic Hydrocarbon**

TLV (mg/m3): **1,399**

Maximum Hourly Emission Rate (lbs/hr): **7.41**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **79**

MAGLC (ug/m3): **33,304**

Pollutant: **Stoddard Solvent**

TLV (mg/m3): **572**

Maximum Hourly Emission Rate (lbs/hr): **12.21**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **130**

MAGLC (ug/m3): **13,633**

Pollutant: **Ethyl Acetate**

TLV (mg/m3): **1,440**

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Maximum Hourly Emission Rate (lbs/hr): **11.08**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **118**

MAGLC (ug/m3): **34,317**

Pollutant: **Isopropanol**

TLV (mg/m3): **490**

Maximum Hourly Emission Rate (lbs/hr): **1.71**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**

MAGLC (ug/m3): **11,703**

Pollutant: **Methyl Propyl Ketone**

TLV (mg/m3): **705**

Maximum Hourly Emission Rate (lbs/hr): **2.47**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **26**

MAGLC (ug/m3): **16,783**

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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9. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing the use of noncomplying coatings (i.e., an exceedance of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following limitations:
 - a. the rolling, 12-month coating usage limitation (25,269 gallons);
 - b. the rolling, 12-month thinner and cleanup material usage limitation (500 gallons);
 - c. the rolling, 12-month VOC emission limitation (46.22 tons);
 - d. the rolling, 12-month individual HAP emission limitation (9.9 tons); and
 - e. the rolling, 12-month total combined HAP emission limitation (24.5 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

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

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- 1.a Emission Limitation: 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.2.c U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation: Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.c Emissions Limitation: Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound PM per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.d Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 46.22 tons/rolling, 12-month period.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.3.e above.

- 1.e Emission Limitations: Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 24.5 tons/rolling, 12-month period. Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, K005 and K006 shall not exceed 9.9 tons/rolling, 12-month period.

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Applicable Compliance Method: Compliance with these HAP emission limitations shall be demonstrated through the monthly records required in Sections C.5.a and C.5.b above.

- 1.f Emission Limitation: The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to Section C.1.c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.g Emission Limitation: Volatile Organic Compound(VOC) emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 pounds per hour.

Applicable Compliance Method: Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.1.f above.

F. Miscellaneous Requirements

1. The terms and conditions of this emission unit, A.1 through E.1, are federally enforceable.