



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

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MAILING ADDRESS:

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

7/21/2009

Mr. Richard Jurjevic
Holmco Industries
P.O. Box 287
Berlin, OH 44805

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238002001
Permit Number: P0104923
Permit Type: Initial Installation
County: Holmes

Certified Mail

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

Dear Permit Holder:

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

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

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

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

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: Ohio EPA-NEDO

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



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

FINAL

**Air Pollution Permit-to-Install and Operate
for
Holmco Industries**

Facility ID: 0238002001
Permit Number: P0104923
Permit Type: Initial Installation
Issued: 7/21/2009
Effective: 7/21/2009
Expiration: 7/21/2014



Air Pollution Permit-to-Install and Operate
for
Holmco Industries

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104923
Facility ID: 0238002001
Effective Date: 7/21/2009

Authorization

Facility ID: 0238002001
Application Number(s): A0037514
Permit Number: P0104923
Permit Description: New installation of 10 misc. metal coating operations and a non-HAP degreaser with federally enforceable limitations to avoid Title V and MACT requirements.
Permit Type: Initial Installation
Permit Fee: \$2,200.00
Issue Date: 7/21/2009
Effective Date: 7/21/2009
Expiration Date: 7/21/2014
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Holmco Industries
7227 St Rte 515
Winesburg, OH 44690

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0104923
Permit Description: New installation of 10 misc. metal coating operations and a non-HAP degreaser with federally enforceable limitations to avoid Title V and MACT requirements.

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

Emissions Unit ID: L001
Company Equipment ID: Degreaser 1
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Metal Coating Operations

Emissions Unit ID:	K001
Company Equipment ID:	Spin 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Roller 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Roller 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Roller 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Roller 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Roller 5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Roller 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Brush 1
Superseded Permit Number:	



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104923
Facility ID: 0238002001
Effective Date: 7/21/2009

Type:	General Permit Category and	Not Applicable
Emissions Unit ID:		K009
	Company Equipment ID:	Spray 1
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable
Emissions Unit ID:		K010
	Company Equipment ID:	Spray 2
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104923

Facility ID: 0238002001

Effective Date: 7/21/2009

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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



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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104923

Facility ID: 0238002001

Effective Date: 7/21/2009

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104923

Facility ID: 0238002001

Effective Date: 7/21/2009

C. Emissions Unit Terms and Conditions



1. L001, Degreaser 1

Operations, Property and/or Equipment Description:

Degreaser 1. An open top non-halogenated HAP vapor degreaser for metal cleaning

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(O)(3)	See b)(2)a, b)(2)b, and c)(1) below.
b.	OAC rule 3745-31-05(A)(3)	Exempt. See b)(2)c below.
c.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)d and c)(2) below.

(2) Additional Terms and Conditions

a. The open top vapor degreaser shall be equipped with and shall employ a cover and safety switches as described below:

i. The cover shall be installed so that it can be opened and closed easily without disturbing the vapor zone.

ii. A condenser flow switch and thermostat (or other such device) shall shut off the sump heat if the condenser coolant is either not circulating or too warm.



- iii. If using a spray application, a spray safety switch shall shut off the spray pump if the vapor level drops below any fixed spray nozzle.
 - iv. A vapor level control thermostat (or other such device) shall shut off the sump heat when the vapor level rises too high.
 - v. If using a spray application, a spray safety switch shall shut off the spray pump if the vapor level drops below any fixed spray nozzle.
 - vi. A vapor level control thermostat (or other such device) shall shut off the sump heat when the vapor level rises too high.
 - vii. A water flow switch or water pressure switch (or other such device) shall shut off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.
- b. The open top vapor degreaser shall be equipped with a freeboard and a freeboard ratio greater than or equal to 0.75 shall be maintained. If the open top vapor degreaser opening is greater than 10 square feet, the cover must be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use.
- c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the potentials to emit for VOC is less than 10 tons per year with the required work practices under OAC rule 3745-21-09(O)(3).
- d. The permittee voluntarily proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart T, National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning:
- i. Facility-wide VOC emissions shall not exceed 99.90 tons per year, based upon a rolling, 12-month summation of monthly emissions;
 - ii. Each individual hazardous air pollutant (HAP) emissions facility-wide shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - iii. Total combined HAPs emissions facility-wide shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- c) Operational Restrictions
- (1) The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:



- a. The cover shall be kept closed at all times except when processing work loads through the degreaser.
 - b. Solvent carry-out shall be minimized by:
 - i. racking parts so that solvent drains freely and is not trapped;
 - ii. moving parts in and out of the degreaser at less than 11 feet per minute;
 - iii. holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;
 - iv. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
 - v. allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer.
 - c. Porous and/or absorbent materials shall not be cleaned.
 - d. Workloads shall occupy no more than one-half of the degreaser's open-top area.
 - e. Solvent spraying shall only be conducted within the vapor level.
 - f. Solvent leaks shall be repaired immediately, or the degreaser shall be shut down.
 - g. Solvent waste shall only be stored in covered containers.
 - h. The degreaser shall be operated so that water cannot be visually detected in solvent exiting the water separator.
 - i. No ventilation fans shall be used near the degreaser opening.
 - j. When the cover is open, the open top vapor degreaser shall not be exposed to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip.
 - k. If a lip exhaust is used on the open top vapor degreaser, the ventilation rate shall not exceed 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - l. A permanent, conspicuous label, summarizing the operating procedures shall be posted on or near to the degreaser.
- (2) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following facility-wide emission levels specified in the following table:



Month(s)	Maximum Allowable Cumulative Emissions of VOC (tons)	Maximum Allowable Cumulative Emissions of Each Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Total Combined HAPs (tons)
1	10.0	1.0	2.5
1-2	20.0	2.0	5.0
1-3	30.0	3.0	7.5
1-4	40.0	4.0	10.0
1-5	50.0	5.0	12.5
1-6	60.0	6.0	15.0
1-7	70.0	7.0	17.5
1-8	80.0	8.0	20.0
1-9	90.0	9.0	22.5
1-10	99.9	9.90	24.9
1-11	99.9	9.90	24.9
1-12	99.9	9.90	24.9

After the first 12 calendar months of following the issuance of this permit, compliance with the annual emission limitations for VOC, each individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the emissions of VOC, each individual HAP, and total combined HAPs.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for this emissions unit:
 - a. the types of solvents employed in the open top vapor degreaser, including the chemical name(s) and concentration;
 - b. a record of the freeboard ratio before and after each addition of make-up solvent and the date of the solvent addition;



- c. any period of time in which the freeboard ratio is not maintained at 0.75 or greater; and
- d. a record of the date and nature of any other maintenance activities for the freeboard ratio control.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall record and keep the following information each month for this emissions unit:
 - a. the total cleaning solvent added to the open top vapor degreaser or the amount purchased for use in the emissions unit during the year;
 - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and
 - c. the monthly VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons per month.
- (3) The permittee shall keep the following information each month:
 - a. the monthly VOC emissions facility-wide, in tons per month;
 - b. the rolling, 12-month summation of total VOC emissions facility-wide, in tons.
 - c. the monthly individual HAP emissions facility-wide, in tons per month;
 - d. the rolling, 12-month summation of each individual HAP emissions facility-wide, in tons;
 - e. the monthly total combined HAPs emissions facility-wide, in tons per month; and
 - f. the rolling, 12-month summation of total combined HAPs emissions facility-wide, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports documenting any period of time during which the freeboard was not maintained at a ratio of 0.75 or greater, and/or any period of time during which the open top vapor degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:



- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. The facility-wide VOC emissions shall not exceed 99.9 tons per year, based upon a rolling, 12-month summation of monthly emissions;
 - ii. The facility-wide individual HAP emissions shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - iii. The facility-wide total combined HAPs emissions shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) The permittee shall quantify VOC emissions through a material balance test, conducted for a sufficient period of time to compute an average emission rate. The following procedures shall be implemented in order to perform this material balance test and document the average VOC emissions from this emissions unit, as follows:
 - a. the degreaser tank shall be cleaned before testing begins;



- b. records shall be maintained of the weight or volume of solvent used to initially fill the cleaning tank and the volume or weight of the make-up solvent added to the tank during the test period;
- c. at the end of the test period (which can coincide with the normal solvent replacement cycle) the used solvent shall be pumped or drained out of the tank and the volume or weight measured using the same method applied in Ab@ above;
- d. a record shall be maintained of the time (hours) passing between filling the tank with fresh solvent (start of test period) to the removal of the waste solvent, as well as, the number of parts or weight of the work load cleaned during the test period;
- e. a sample of the used solvent shall be analyzed for the percent oil, metal chips, and other contaminants (the oil and solvent proportions can be estimated by weighing samples of used solvent before and after boiling off the solvent);
- f. from the analysis of the used/waste solvent in Ae@, the volume or weight of oils, dissolved from the cleaned parts or work load, shall be documented;
- g. the total VOC emissions from the cleaning tank during the test period shall be calculated* from the volume or weight of solvent displaced by the oil, plus the total makeup solvent added to the tank to the same initial fill line, and this volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the solvent; or
- h. if the final solvent line is below the initial solvent line in the tank when the waste solvent is pumped or drained out, the total VOC emissions from the cleaning tank during the test period shall equal the measured volume or weight of fresh solvent used to initially fill the tank, minus the total volume or weight of used solvent pumped/drained out, plus the volume or weight of solvent displaced by the oil (calculated in Ae@ above), plus the volume or weight of makeup solvent added to the tank during the test period, and this total volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent; or
- i. as an alternative to the procedures for estimating VOC emission from the cleaning tank in Ag@ or Ah@ above, the VOC emissions may be calculated as the difference between the total volume of solvent added to the cleaning tank during the test period (the amount used to initially fill the tank and the makeup solvent added) and (minus) the solvent contained in the used solvent pumped or drained out; and this difference in volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent;
- j. the average VOC emissions rate shall be calculated by dividing the total emissions calculated in Ag@, Ah@, or Ai@ by the total hours of the test period (and/or divided by the total parts cleaned during the test period if an emissions per production rate is required) as recorded in Ad@; and



k. if waste solvents pumped from the solvent cleaning tank are not immediately sealed to prevent evaporation and if a record is not maintained of the volume or amount sent offsite for recovery and/or disposal, such waste solvent losses shall be included with those calculated above in any required emissions report(s) if it cannot be demonstrated that this volume of material has been properly recovered or disposed of and/or has not been lost through evaporation to the atmosphere.

* If solvent measurements are recorded by volume the density of the solvent shall be used to convert gallons to pounds.

(2) Compliance with the emission limitations in sections b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide VOC emissions shall not exceed 99.9 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

b. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

c. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group - Metal Coating Operations: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010,

EU ID	Operations, Property and/or Equipment Description
K001	Spin 1. A spin coating operation for coating metal parts with adhesive.
K002	Roller 1. A roller coating operation for coating metal parts with adhesive.
K003	Roller 2. A roller coating operation for coating metal parts with adhesive.
K004	Roller 3. A roller coating operation for coating metal parts with adhesive.
K005	Roller 4. A roller coating operation for coating metal parts with adhesive.
K006	Roller 5. A roller coating operation for coating metal parts with adhesive.
K007	Roller 6. A roller coating operation for coating metal parts with adhesive.
K008	Brush 1. A brush coating operation for coating metal parts with adhesive.
K009	Spray 1. A spray coating operation for coating metal parts with adhesive.
K010	Spray 2. A spray coating operation for coating metal parts with adhesive.

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

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

a. b)(1)d, d)(4), d)(5), d)(6), d)(7), and e)(4).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a below.
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b below.
c.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)c and c)(1) below.
d.	OAC rule 3745-114-01	See d)(4), d)(5), d)(6), d)(7), and e)(4) below.



(2) Additional Terms and Conditions

- a. The permittee shall not employ more than 10 gallons of coating per day for each of the miscellaneous metal parts and products coating lines. The daily usage limitation for each coating line shall not include coatings applied to parts or products which are not metal.
- b. Each emissions unit (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010) shall not emit more than 62.50 pounds per day and 11.41 tons per year of volatile organic compound (VOC) emissions.
- c. The permittee voluntarily proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart M, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. Facility-wide VOC emissions shall not exceed 99.90 tons per year, based upon a rolling, 12-month summation of monthly emissions;
 - ii. Facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - iii. Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

c) Operational Restrictions

- (1) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following facility-wide emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (tons)	Maximum Allowable Cumulative Emissions of Each Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Total Combined HAPs (tons)
1	10.0	1.0	2.5
1-2	20.0	2.0	5.0
1-3	30.0	3.0	7.5



Month(s)	Maximum Allowable Cumulative Emissions of VOC (tons)	Maximum Allowable Cumulative Emissions of Each Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Total Combined HAPs (tons)
1-4	40.0	4.0	10.0
1-5	50.0	5.0	12.5
1-6	60.0	6.0	15.0
1-7	70.0	7.0	17.5
1-8	80.0	8.0	20.0
1-9	90.0	9.0	22.5
1-10	99.9	9.90	24.9
1-11	99.9	9.90	24.9
1-12	99.9	9.90	24.9

After the first 12 calendar months of following the issuance of this permit, compliance with the annual emission limitations for VOC, each individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the emissions of VOC, each individual HAP, and total combined HAPs.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a daily basis for the coating and cleanup materials applied in each emissions unit (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010):

- a. the name and identification number of each coating employed;
- b. the volume, in gallons, of each coating employed;
- c. the total volume, in gallons, of all of the coatings employed;
- d. the VOC content for each coating applied, in pounds per gallon;
- e. the total VOC emissions from all coatings applied, i.e., the summation of the products of “b” times “d” for each individual coating applied;



- f. the name and identification of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the number of gallons of each cleanup material employed;
 - i. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of “g” times “h” for all cleanup materials employed; and
 - j. the total VOC emissions from all coatings and cleanup materials employed, in pounds, the sum of “e” and “i”.
- (2) The permittee shall collect and record the following information each month for each emissions unit (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010):
- a. the volume, in gallons, of each coating employed, i.e., the summation of daily coating usage, recorded in d)(1), for the month;
 - b. the individual HAP content(s) for each coating applied, in pounds per gallon;
 - c. the total emissions of each individual HAP from all coatings applied, i.e., the summation of the products of “a” times “b” for each individual coating applied;
 - d. the total combined HAPs content for each coating applied, in pounds per gallon;
 - e. the total emissions of total combined HAPs from all coatings applied, i.e., the summation of the products of “a” times “d” for each individual coating applied;
 - f. the number of gallons of each cleanup material employed, i.e., the summation of daily cleanup material usage, recorded in d)(1), for the month;
 - g. the individual HAP content(s) of each cleanup material, in pounds per gallon;
 - h. the total emissions of each individual HAP from all cleanup materials employed, i.e., the summation of the products of “f” times “g” for each individual cleanup material employed;
 - i. the total combined HAPs content for each cleanup material employed, in pounds per gallon;
 - j. the total emissions of total combined HAPs from all cleanup materials employed, i.e., the summation of the products of “f” times “i” for each individual cleanup material employed;
 - k. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “h”;
 - l. the total emissions of total combined HAPs from all coatings and cleanup materials employed, in pounds or tons, the sum of “e” and “j”; and



- m. the total VOC emissions from all coatings and cleanup materials employed, in tons, and shall be the summation of daily VOC emissions, recorded in d)(1), for the month.
- (3) The permittee shall keep the following facility-wide information each month:
- a. the monthly VOC emissions, in tons per month;
 - b. the rolling, 12-month summation of total VOC emissions, in tons.
 - c. the monthly individual HAP emissions, in tons per month;
 - d. the rolling, 12-month summation of each individual HAP emissions, in tons;
 - e. the monthly total combined HAPs emissions, in tons per month; and
 - f. the rolling, 12-month summation of total combined HAPs emissions, in tons.
- (4) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute⁶, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A⁶, as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices⁶; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological



Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., AX hours per day and AY days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Methyl isobutyl ketone

TLV (mg/m3): 204.82618

Maximum Hourly Emission Rate (lbs/hr): 36.16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,407

MAGLC (ug/m3): 6,827.54

The permittee, has demonstrated that emissions of methyl isobutyl ketone, from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant



Statute⁶, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that each coating line employs more than 10 gallons maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
- (2) The permittee shall also submit annual reports that specify the total VOC emissions from each emissions unit (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010) for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the facility-wide VOC emissions shall not exceed 99.9 tons per year, based upon a rolling, 12-month summation of monthly emissions;
 - ii. the facility-wide emissions of each individual HAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - iii. the facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st



of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit

f) Testing Requirements

- (1) Compliance with the emission limitations in sections b)(1) and b)(2) above shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not employ more than 10 gallons of coating per day for each of the miscellaneous metal parts and products coating lines (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1)c.

b. Emission Limitation:

Each emissions unit (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010) shall not emit more than 62.50 pounds per day of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1)j.

c. Emission Limitation:

Each emissions unit (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010) shall not emit more than 11.41 tons per year of VOC emissions.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)m and shall be the summation of the calendar year.

d. Emission Limitation:

Facility-wide VOC emissions shall not exceed 99.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

e. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

f. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

- (2) USEPA Method 24 or formulation data shall be used to determine the VOC contents of each coating.
- (3) Formulation data shall be used to determine the HAP contents of each individual HAP and total combined HAPs.

g) Miscellaneous Requirements

- (1) None.