

Synthetic Minor Determination and/or Netting Determination

Permit To Install **01-08969**

A. Source Description

The applicant, Horton Emergency Vehicles (Horton) has submitted a PTI application for the Chapter 31 modification of four existing paint booths, one paint mix room and nine various touchup, cleanup and adhesive spray stations. The fourteen emissions units were previously permitted under PTI 01-06774 issued November 5, 1997. The purpose of the spray booths is to apply various finishes in the manufacturing of ambulances. The paint mix room blends reducers and hardeners with basic paints for desired coating performance. The cleanup areas prepare metal surfaces for painting. The touchup areas finish and repair small regions of the products. The adhesive spray areas prepare foam rubber and other accessories for attachment to the product.

B. Facility Emissions and Attainment Status

Franklin County is classified as nonattainment for the 8-hour ozone NAAQS and PM 2.5. Horton is classified as a synthetic minor facility for volatile organic compounds (VOC) and single hazardous air pollutant (HAP). Without synthetic minor limitations presented in these permits, potential emissions from the four spray booths and ten work areas would trigger both NESHAPS (MACT) and Title V permitting thresholds levels. Currently, there are no additional permitted emissions units located at the Horton facility other than those presented in this permit-to-install. The facility wide emissions (tons per year), *with the current* synthetic minor limits found in PTI 01-6674, are:

Horton Emergency Vehicles	VOC (TPY)	Individual HAP (TPY)	Combined HAP (TPY)
TOTAL	50.2	9.85	19.8

C. Source Emissions

Horton has proposed material usage as well as VOC content restrictions that correspond to potential VOC emissions as described in the table below.

Emission Unit	Description	Tons VOC
K001	Paint Booth #1	5.32
K002	Paint Booth #2	11.86
K003	Paint Booth #3	8.69
K004	Paint Booth #4	8.15
K005	Paint Misc. Ctg.	1.23
K006	LA Final Ctg.	4.49
K007	NY Final Ctg.	0.4
K008	Misc. Prod. Assy. Ctg.	4.0
K009	Cab. Shop Tab. 1 Ctg.	1.81
K010	Line Instn. Tab. 2 Ctg.	0.5
K011	Fabr. Area Ctg.	4.2

K012	Delivery Area Ctg.	5.66
K013	Paint Final Prep. Misc.	7.29
P001	Paint Mix Room	4.38

Horton has also requested that emissions from emissions units K001 through K013 and P001 not exceed 9.85 tons of any single HAP and 19.8 tons of all HAP.

Limiting the material usages on a 12-month rolling period basis in addition to the VOC content restrictions will result in Horton having a PTE below those levels which trigger Title V and or non attainment NSR permitting requirements.

D. Conclusion

The permit contains operational restrictions, record keeping and reporting requirements to ensure on going compliance with the emission limitations. Horton will remain a synthetic minor facility. Emissions of any single HAP will not exceed 9.85 tons and total HAP emissions will not exceed 19.8 tons per year.

The synthetic minor will effectively restrict the volatile organic compounds and hazardous air pollutant emissions below Title V and MACT emissions thresholds. The federally enforceable limits included in the proposed PTI will allow Horton to avoid non attainment new source review for the 8 hour ozone standard. This permitting action does not trigger 40 CFR 52(R)(4) because the allowable emissions are below the major stationary emission trigger levels due to an increase of only 13.78 tons.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 01-08969

Fac ID: 0125042195

DATE: 2/9/2006

Horton Emergency Vehicle Company
Brian Lehman
3800 McDowell
Grove City, OH 43123

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 **\$2800** 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

Mid-Ohio Regional Planning Commission

FRANKLIN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08969 FOR AN AIR CONTAMINANT SOURCE FOR
Horton Emergency Vehicle Company**

On 2/9/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Horton Emergency Vehicle Company**, located at **3800 McDowell Road, Grove City, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08969:

Paint booths preparation and operation

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 01-08969

Application Number: 01-08969
Facility ID: 0125042195
Permit Fee: **To be entered upon final issuance**
Name of Facility: Horton Emergency Vehicle Company
Person to Contact: Brian Lehman
Address: 3800 McDowell
Grove City, OH 43123

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3800 McDowell Road
Grove City, Ohio**

Description of proposed emissions unit(s):
Paint booths preparation and operation

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

Horton Emergency Vehicle Company
PTI Application: 01-08969
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0125042195

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,

Horton Emergency Vehicle Company

Facility ID: 0125042195

PTI Application: 01-08969

Issued: To be entered upon final issuance

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.

Horton Emergency Vehicle Company
PTI Application: 01-08969
Issued: To be entered upon final issuance

Facility ID: 0125042195

9. Construction of New Sources(s)

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

Horton Emergency Vehicle Company

Facility ID: 0125042195

PTI Application: 01-08969

Issued: To be entered upon final issuance

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

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

Horton Emergency Vehicle Company
PTI Application: 01-08969
Issued: To be entered upon final issuance

Facility ID: 0125042195

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	67.98
Individual HAP	9.85
Combined HAPs	19.80
PE	12.05

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K001 - Devilbiss paint booth No. 1 - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(d)
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	
	OAC rule 3745-21-09(U)(1)(d)	

**Horto
PTI A**

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.
Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 5.52 lbs/hr.	See B.4 below.
Particulate emissions (PE) shall not exceed 2.41 tons per year.	See B.7 below.
Compliance with this rule also includes compliance with the requirements of OAC rules rule 3745-17-11(B), 3745-17-07(A), 3745-21-09(U)(1)(d), 3745-21-09(U)(2)(d) 3745-31-05(C) and 3745-35-07(B).	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
VOC emissions from coatings and cleanup materials from emissions unit K001 shall not exceed 5.32 tons per rolling 12- month period.	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The hourly allowable emissions limitations for this emissions unit were established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. 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 primer usage, upon issuance of this permit. The maximum annual primer usage for this emissions unit shall not exceed 144 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 topcoat usage, upon issuance of this permit. The maximum annual topcoat usage for this emissions unit shall not exceed 1,362 gallons, based upon a rolling, 12 month summation of the 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 clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 176 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
4. The maximum VOC content of primers shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.
5. The maximum VOC content of any topcoats, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.
6. The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.
7. The number of motor vehicles coated in one day shall not exceed thirty-four.
8. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K001:
 - a. the name and identification of each primer, topcoat, and cleanup material employed by emissions unit K001;
 - b. the VOC content for each primer, topcoat, and cleanup material, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons of each primer, topcoat and cleanup material employed by emissions unit K001;
 - d. the rolling, 12-month summation of the primer usage, in gallons;
 - e. the rolling, 12-month summation of the topcoat usage, in gallons;
 - f. the rolling, 12-month summation of the cleanup material usage, in gallons;
 - g. the total VOC emissions from all primers, topcoats and cleanup materials employed by K001, in tons per rolling, 12-month period; and
 - h. the number of motor vehicles coated.

2. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of

**Horto
PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. 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.

D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying primers, coatings and/or clean up materials. 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 Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated in any day ever exceeded thirty-four. 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.
- 3. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.
- 4. The permittee shall submit quarterly deviation (excursion) reports which identify all

exceedances all of the following:

- a. the rolling 12-month primer usage limitation;
- b. the rolling 12-month topcoat usage limitation;
- c. the rolling 12-month cleanup material usage limitation;
- d. the total VOC emissions rates for all primers, topcoats and cleanup materials employed by emissions unit K001 in tons per rolling, 12-month period;
- e. the total emissions of each individual HAP from all primers, topcoats and cleanup materials, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
- e. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

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 methods:
 - a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 5.52 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.
 - b. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.

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.
 - c. Emission Limitation: PE shall not exceed 2.41 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (the

**Horto
PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- d. Emission Limitation: VOC emissions from coatings and cleanup materials shall not exceed 5.32 tons per rolling 12- month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- e. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- f. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- g. Emissions Limitation: 3.5 pounds of VOC per gallon of primer coating, excluding water and exempt solvents.

Applicable Compliance Method: Compliance with the VOC content of the coatings applied in this emissions unit shall be determined through monthly recordkeeping, as specified in Sections C.1.

- h. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- i. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- j. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance 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).

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

- l. Emissions Limitation: The maximum annual primer usage for this emissions unit shall not exceed 144 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- m. Emissions Limitation: The maximum annual topcoat usage for this emissions unit shall not exceed 1,362 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- n. Emissions Limitation: The maximum annual clean up usage for this emissions unit shall not exceed 176 gallons, based upon a rolling, 12 month summation of the clean up usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

F. Miscellaneous Requirements

None

**Horto
PTI A**

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K002 - Devilbiss paint booth No.2 - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. (<u>This emissions unit coats motor vehicles with topcoats.</u>)	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(U)(2)(d) OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)

**Horto
PTI A**

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

Volatile Organic
Compounds (VOC)
emissions from coatings
and cleanup materials
shall not exceed 8.60
lbs/hr.

Particulate emissions
(PE) shall not exceed
2.41 tons per year.

Compliance with this rule
also includes
compliance with the
requirements of OAC
rules rule 3745-17-11(B),
3745-17-07(A),
3745-21-09(U)(2)(d)
3745-31-05(C) and
3745-35-07(B).

VOC emissions from
coatings and cleanup
materials from emissions
unit K002 shall not
exceed 11.86 tons per
rolling 12- month period.

Emissions of any single
hazardous air pollutant
(HAP) from all materials
employed by emissions
units K001 through K013
and P001 shall not
exceed 9.85 tons per
rolling 12-month period.

Emissions of all HAPs from all
materials employed by emissions
units K001 through K013 and
P001 shall not exceed 19.8 tons
per rolling 12-month period.

See B.3. below.

Particulate emissions (PE) shall
not exceed 0.551 lb/hr.

Visible particulate emissions from
any stack shall not exceed 20%
opacity as a 6-minute average,
except as provided by the rule.

2. Additional Terms and Conditions

- 2.a The hourly allowable emissions limitations for this emissions unit were established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. 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 annual coating usage for this emissions unit shall not exceed 2920 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 cleanup material usage, upon issuance of this permit. The maximum annual cleanup material usage for this emissions unit shall not exceed 164 gallons, based upon a rolling, 12 month summation of the cleanup material usage figures.
3. The number of motor vehicles coated in one day shall not exceed thirty-four.
4. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
5. The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.
6. The maximum VOC content of any coating, as applied, shall not exceed 7.77 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K002:
 - a. the name and identification of each topcoat and cleanup material employed by emissions unit K002;
 - b. the VOC content for each topcoat and cleanup material, in pounds per gallon, excluding water and exempt solvents, employed by emissions unit K002;

Issued: To be entered upon final issuance

- c. the number of gallons employed by K002 of each topcoat and cleanup material;
 - d. the rolling, 12-month summation of the topcoat usage, in gallons;
 - e. the rolling, 12-month summation of the cleanup material usage, in gallons;
 - f. the total VOC emissions from all coatings and cleanup materials employed by K002, in tons per rolling, 12-month period; and
 - g. the number of motor vehicles coated.
2. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and

- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings and or clean up materials. 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 Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated in one day exceed thirty-four. 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 day of the exceedance.
3. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances all of the following:
 - a. the rolling 12-month primer usage limitation;
 - b. the rolling 12-month topcoat usage limitation;
 - c. the rolling 12-month cleanup material usage limitation;
 - d. the total VOC emissions rates for all primers, topcoats and cleanup materials employed by emissions unit K002 in tons per rolling, 12-month period;
 - d. the total emissions of each individual HAP from all primers, topcoats and cleanup materials, employed by emissions unit K001 through K013 and P001, in

Emissions Unit ID: **K002**

- tons per rolling, 12-month period; and
- e. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:

- a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 8.60 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.

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.

- c. Emission Limitation: PE shall not exceed 2.41 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- d. Emission Limitation: VOC emissions from coatings and cleanup materials shall not exceed 11.86 tons per rolling 12- month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

Emissions Unit ID: **K002**

- e. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- f. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- g. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- h. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

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

- j. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance 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).

**Horto
PTI A**

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

- k. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 2920 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- l. Emissions Limitation: The maximum annual cleanup material usage for this emissions unit shall not exceed 164 gallons, based upon a rolling, 12 month summation of the cleanup material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

F. Miscellaneous Requirements

None

**Horto
PTI A**

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K003 - Devilbiss paint booth No.3 - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. (<u>This emissions unit coats miscellaneous metal parts with primers and topcoats.</u>)	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(U)(1)(d) OAC rule 3745-21-09(U)(2)(d) OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)

Horto**PTI A**Emissions Unit ID: **K003****Issued: To be entered upon final issuance**

<u>Applicable Emissions Limitations/Control Measures</u>	Emissions of all HAPS from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.
Volatile Organic Compounds (VOC) emissions shall not exceed 6.52 lbs/hr.	See A.2.a below.
Particulate emissions (PE) shall not exceed 2.41 tons per year.	See A.2.c below.
Compliance with this rule also includes compliance with the requirements of OAC rules rule 3745-17-11(B), 3745-17-07(A), 3745-21-09(U)(1)(d), 3745-21-09(U)(2)(d) 3745-31-05(C) and 3745-35-07(B).	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
See A.2.b below.	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
VOC emissions from emissions unit K003 shall not exceed 8.69 tons per rolling 12- month period.	
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.	

2. Additional Terms and Conditions

- 2.a** The maximum VOC content of any primer, as applied, shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.
- 2.b** The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.
- 2.c** The number of motor vehicles coated in one day shall not exceed 34.
- 2.d** The hourly allowable emissions limitations for this emissions unit were established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

- 1. 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 annual coating usage for this emissions unit shall not exceed 2621 gallons, based upon a rolling, 12 month summation of the coating usage figures.
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.
- 3. The number of motor vehicles coated in one day shall not exceed 34.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions unit K003:
 - a. the name and identification of each coating employed by emissions unit K003;
 - b. the VOC content for each coating employed by emissions unit K003, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each coating employed by emissions unit K003;

**Horto
PTI A**Emissions Unit ID: **K003****Issued: To be entered upon final issuance**

- d. the rolling, 12-month summation of the coating usage, in gallons; and
 - e. the total VOC emissions from all coatings employed by K003, in tons per rolling, 12-month period.
2. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

Emissions Unit ID: **K003**

obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings. 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 Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated ever exceeded 34. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 30 days after the exceedance occurs.
3. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances all of the following:
 - a. the rolling 12-month coating usage limitation;
 - b. the total VOC emissions rates for all primers, topcoats and cleanup materials employed by emissions unit K003 in tons per rolling, 12-month period;
 - c. the total emissions of each individual HAP from all primers, topcoats and cleanup materials, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - d. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be

Issued: To be entered upon final issuance

submitted by January 31 of each year.

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 methods:

- a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 6.52 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.

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.

- c. Emission Limitation: PE shall not exceed 2.41 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- d. Emission Limitation: VOC emissions from coatings shall not exceed 8.69 tons per rolling 12- month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- e. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- f. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per

rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- g. Emissions Limitation: The maximum VOC content of any primer, as applied, shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- h. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

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

- k. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance 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).

- l. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 2621 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

F. Miscellaneous Requirements

34

Horto

PTI A

Issued: To be entered upon final issuance

None

Emissions Unit ID: **K003**

**Horto
PTI A**

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K004 - Devilbiss paint booth No. 4 - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. (<u>This emissions unit coats motor vehicles with primers.</u>)	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(U)(1)(d) OAC rule 3745-21-09(U)(2)(d) OAC rule 3745-17-11(B) OAC rule 3745-17-07(A) OAC rule 3745-31-05(C) (synthetic minor to avoid NSR) OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)

Horto**PTI A**Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

Applicable Emissions Limitations/Control Measures	
Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 6.90 lbs/hr.	and P001 shall not exceed 9.85 tons per rolling 12-month period.
See A.2.b below.	Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.
Particulate emissions (PE) shall not exceed 2.41 tons per year.	See A.2.a below.
Compliance with this rule also includes compliance with the requirements of OAC rules rule 3745-17-11(B), 3745-17-07(A), 3745-21-09(U)(1)(d), 3745-21-09(U)(2)(d) 3745-31-05(C) and 3745-35-07(B).	See A.2.c below.
VOC emissions from coatings and cleanup materials from this emissions unit shall not exceed 8.15 tons per rolling 12- month period.	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

- 2.a** The maximum VOC content of any primer, as applied, shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.
- 2.b** The maximum VOC content of any topcoat, as applied, shall not exceed 6.12 lbs of VOC per gallon, excluding water and exempt solvents.
- 2.c** The number of motor vehicles coated in one day shall not exceed 34.
- 2.d** The hourly allowable emissions limitations for this emissions unit were established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

- 1. 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 annual coating usage for this emissions unit shall not exceed 2662 gallons, based upon a rolling, 12 month summation of the coating usage figures.
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions unit K004:
 - a. the name and identification of each coating employed by emissions unit K004;
 - b. the VOC content for each coating employed by emissions unit K004, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each coating employed by emissions unit K004;
 - d. the rolling, 12-month summation of the coating usage, in gallons; and

**Horto
PTI A**Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

- e. the total VOC emissions from all coatings employed by K004, in tons per rolling, 12-month period
2. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings

**Horto
PTI A**Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

or clean materials. This information does not have to be kept on a line-by-line basis.

3. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings. 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 Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances all of the following:
 - a. the rolling 12-month coating usage limitation;
 - b. the sum of the total VOC emissions rates for all coatings employed by emissions unit K004 in tons per rolling, 12-month period;
 - c. the total emissions of each individual HAP from all coatings, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period;
 - d. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:

Horton Emergency Vehicle Company

PTI Application: 01-09060

Issue

Facility ID: 0125042195

Emissions Unit ID: **K004**

- a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 6.90 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.

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.

- c. Emission Limitation: PE shall not exceed 2.41 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- d. Emission Limitation: VOC emissions from coatings and cleanup materials shall not exceed 8.15 tons per rolling 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- e. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- f. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- g. Emissions Limitation: The maximum VOC content of any primer, as applied, shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.

Issued: To be entered upon final issuance

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- h. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.12 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- i. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
- j. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance 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).

- k. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 2662 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

F. Miscellaneous Requirements

None

Horton Emergency Vehicle Company
 PTI Application: 01-08960
 Issue

Facility ID: 0125042195

Emissions Unit ID: K005

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Paint department final miscellaneous coating - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit cleans up partially assembled motor vehicles.)</u>	OAC rule 3745-31-05(A)(3)	Volatile Organic Compounds (VOC) emissions shall not exceed 1.22 lbs/hr. Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(U)(2)(e), 3745-31-05(C) and 3745-35-07(B).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	VOC emissions from this emissions unit shall not exceed 1.23 tons per rolling 12- month period.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.
	OAC rule 3745-21-09(U)(2)(e)	Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.
		See A.2.a below.

**Horto
PTI A**

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the emissions unit never uses more than 10 gallons per day when coating miscellaneous metal parts.
- 2.b** The hourly allowable emissions limitation for this emissions unit were established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. 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 material usage, upon issuance of this permit. The maximum annual material usage for this emissions unit shall not exceed 378 gallons, based upon a rolling, 12 month summation of the material usage figures.
- 2.. The maximum VOC content of the material employed by emissions unit K005 shall not exceed 6.51 lbs VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K005:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions unit K005:
 - a. the name and identification of each material employed by emissions unit K005;
 - b. the VOC content for each material employed by emissions unit K005, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons.
 - e. the total VOC emissions from all materials employed by K005, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each

Horto**PTI A**Emissions Unit ID: **K005**

Issued: To be entered upon final issuance
cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
 - a. the rolling 12-month material usage limitation;
 - b. the sum of the total VOC emissions rates for all materials employed by emissions unit K005 in tons per rolling, 12-month period;
 - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - d. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:
 - a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions from shall not exceed 1.22 lbs/hr.

Issued: To be entered upon final issuance

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- b. Emission Limitation: VOC emissions shall not exceed 1.23 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- e. Emissions Limitation: The maximum VOC content of the material employed by emissions unit K005 shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

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

- g. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 378 gallons, based upon a rolling, 12 month summation of the material usage figures.

Horton Emergency Vehicle Company
PTI Application: 01-08960
Issue:

Facility ID: 0125042195

Emissions Unit ID: K005

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

**Horto
PTI A**

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Line area final coating - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit attaches parts to, and cleans up motor vehicles.)</u>	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 40 lbs/day.
	OAC rule 3745-21-07(G)(2)	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B). The emission limitations specified by this rule are equivalent or less stringent that the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	Organic compound (OC) emissions from this emissions unit shall not exceed 4.49 per rolling 12-month period.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12- month period.
		Emissions of all HAPs from all materials

Horto

PTI A

Issued: To be entered upon final issuance

employed by emissions
units K001 through K013
and P001 shall not
exceed 19.8 tons per
rolling 12-month period.

Emissions Unit ID: **K006**

**Horto
PTI A**

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. 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 annual coating usage for this emissions unit shall not exceed 1620 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 clean up material usage, upon issuance of this permit. The maximum annual clean up material usage for this emissions unit shall not exceed 27 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.
3. The maximum VOC content of the coating employed by emissions unit K006 shall not exceed 5.43 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of the clean up material employed by emissions unit K006 shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit 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 OC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all coatings and cleanup materials employed, in pounds per day; and

- f. the average hourly OC emission rate for all coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for emissions unit K006:
 - a. the name and identification of each material employed by emissions unit K006;
 - b. the OC content for each material employed by emissions unit K006, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by K006, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);

Issued: To be entered upon final issuance

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 1.67 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - c. the rolling 12-month coating usage limitation;
 - d. the rolling 12-month cleanup material usage limitation;
 - e. the sum of the total OC emissions rates for all coating and cleanup material employed by emissions unit K006 in tons per rolling, 12-month period;
 - f. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - g. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:

- a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 1.67 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

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

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 4.49 per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record

**Horto
PTI A**

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

keeping requirements as specified in C.2 above.

- f. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 1620 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 27 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

Horto

PTI A

Emissions Unit ID: K007

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K007 - NY line area final coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit attaches parts to, and cleans up, motor vehicles.)</u>	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.44 pound per hour and 40 lbs/day.
	OAC rule 3745-21-07(G)(2)	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B). The emission limitations specified by this rule are equivalent or less stringent that the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	Organic compound (OC) emissions from this emissions unit shall not exceed 0.4 ton per rolling 12-month period.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12- month period.

Horton Emergency Vehicle Company
PTI Application: 01-08960
Issue

Facility ID: 0125042195

Emissions Unit ID: K007

Emissions of all HAPs
from all materials
employed by emissions
units K001 through K013
and P001 shall not
exceed 19.8 tons per
rolling 12-month period.

**Horto
PTI A**

Emissions Unit ID: **K007**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. 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 material usage, upon issuance of this permit. The maximum annual material usage for this emissions unit shall not exceed 149 gallons, based upon a rolling, 12 month summation of the material usage figures.
2. The maximum VOC content of the material employed by emissions unit K007 shall not exceed 5.43 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K007:
 - a. the company identification for each material employed by emissions unit K007;
 - b. the number of gallons of each material employed by emissions unit K007;
 - c. the OC content of each material employed by emissions unit K007, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all emissions unit K007, in pounds per day; and
 - f. the average hourly OC emission rate for all materials employed by emissions unit K007.
2. The permittee shall collect and record the following information each month for emissions unit K007:
 - a. the name and identification of each material employed by emissions unit K007;
 - b. the OC content for each material employed by emissions unit K007, in pounds per gallon, excluding water and exempt solvents, as applied;

Issued: To be entered upon final issuance

- c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by K007, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each

Horto**PTI A**Emissions Unit ID: **K007**

Issued: To be entered upon final issuance
cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following information:
 - a. each day during which the average hourly OC emissions exceeded 0.44 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - c. the rolling 12-month material usage limitation;
 - d. the sum of the total OC emissions rates for all materials employed by emissions unit K007 in tons per rolling, 12-month period;
 - e. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - f. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:
 - a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 0.44 lbs/hr and 40 lbs/day .

Emissions Unit ID: **K007**

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

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

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 0.40 per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in C.2 above.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 149 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

Horto**PTI A**Emissions Unit ID: **K008****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K008 - Batch lot miscellaneous product assembly coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit coats and cleans up parts.)</u>	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 40 lbs/day.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are equivalent or less stringent that the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	Organic compound (OC) emissions from this emissions unit shall not exceed 4.0 tons per rolling 12-month period.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12- month period. Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Horton Emergency Vehicle Company
PTI Application: 01-08060
Issue:

Facility ID: 0125042195

Emissions Unit ID: K008

2. Additional Terms and Conditions

2.a none

Horto**PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K008****B. Operational Restrictions**

1. 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 annual coating usage for this emissions unit shall not exceed 1256 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 clean up material usage, upon issuance of this permit. The maximum annual clean up material usage for this emissions unit shall not exceed 203 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.
3. The maximum VOC content of the coating employed by emissions unit K008 shall not exceed 5.43 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of the clean up material employed by emissions unit K008 shall not exceed 5.84 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K008:
 - 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 OC 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 OC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each month for emissions unit K008:

Issued: To be entered upon final issuance

- a. the name and identification of each material employed by emissions unit K008;
 - b. the OC content for each material employed by emissions unit K008, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by K008, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material);

Horton Emergency Vehicle Company
PTI Application: 01-08960
Issue:

Facility ID: 0125042195

Emissions Unit ID: K008

and

- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 1.67 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - c. the rolling 12-month coating usage limitation;
 - d. the rolling 12-month cleanup material usage limitation;
 - e. the VOC content of each coating and cleanup material employed by emissions unit K008;
 - f. the sum of the total OC emissions rates for all coating and cleanup material employed by emissions unit K008 in tons per rolling, 12-month period;
 - g. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - h. the total emissions of all HAPs for K001 through K013 and P001, in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:
 - a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 1.67 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

**Horto
PTI A**Emissions Unit ID: **K008****Issued: To be entered upon final issuance**

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

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

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 4.0 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based the record keeping requirements as specified in C.2 above.

- f. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 1256 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 203 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

Horton Emergency Vehicle Company
PTI Application: 01-08060
Issue:

Facility ID: 0125042195

Emissions Unit ID: K008

F. Miscellaneous Requirements

None

Horto

PTI A

Emissions Unit ID: **K009**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K009 - Cabinet shop table No. 1 coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. (<u>This emissions unit coats and cleans up parts.</u>)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 40 lbs/day.
	OAC rule 3745-21-07(G)(2)	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	The emission limitations specified by this rule are equivalent or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Organic compound (OC) emissions from this emissions unit shall not exceed 1.81 tons per rolling 12-month period.
		Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.
		Emissions of all HAPs from all materials employed by emissions units K001

70

Horto

PTI A

Issued: To be entered upon final issuance

through K013 and P001

shall not exceed 19.8

tons per rolling 12-month

period.

Emissions Unit ID: **K009**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions****2.a** none**B. Operational Restrictions**

1. 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 annual coating usage for this emissions unit shall not exceed 628 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 clean up material usage, upon issuance of this permit. The maximum annual clean up material usage for this emissions unit shall not exceed 31 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.
3. The maximum VOC content of the coating employed by emissions unit K009 shall not exceed 5.43 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of the clean up material employed by emissions unit K009 shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K009:
 - 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 OC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all coatings and cleanup materials employed, in

Emissions Unit ID: **K009**

pounds per day; and

- f. the average hourly OC emission rate for all coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for emissions unit K009:
 - a. the name and identification of each material employed by emissions unit K009;
 - b. the OC content for each material employed by emissions unit K009, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by K009, in tons per rolling, 12-month period
 2. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual

Issued: To be entered upon final issuance

HAP contents from f);

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 1.67 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - c. the rolling 12-month coating usage limitation;
 - d. the rolling 12-month cleanup material usage limitation;
 - e. the sum of the total OC emissions rates for all coating and cleanup material employed by emissions unit K009 in tons per rolling, 12-month period;
 - f. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - g. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions

**Horto
PTI A**Emissions Unit ID: **K009**

Issued: To be entered upon final issuance
of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:

- a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 1.67 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

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

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 1.81 tons per rolling 12-month period.

Horton Emergency Vehicle Company

PTI Application: 01-08960

Issue:

Facility ID: 0125042195

Emissions Unit ID: K009

Applicable Compliance Method: Compliance shall be based upon record keeping requirements as specified in C.2 above.

- f. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 628 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 31 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

Horto
PTI A

Emissions Unit ID: **K010**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - Line installation table No. 2 coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit coats parts.)</u>	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)</p> <p>OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)</p>	<p>Organic compound (OC) emissions shall not exceed 0.54 pound per hour and 24 lbs/day.</p> <p>Compliance with this rule also includes compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).</p> <p>The emission limitations specified by this rule are equivalent or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>Organic compound (OC) emissions from this emissions unit shall not exceed 0.5 ton per rolling 12-month period.</p> <p>Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12- month period.</p>

Horton Emergency Vehicle Company
PTI Application: 01-08960
Issue:

Facility ID: 0125042195

Emissions Unit ID: K010

Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions****2.a none****B. Operational Restrictions**

1. 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 material usage, upon issuance of this permit. The maximum annual material usage for this emissions unit shall not exceed 183 gallons, based upon a rolling, 12 month summation of the material usage figures.
2. The maximum VOC content of the material employed by emissions unit K010 shall not exceed 5.43 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K010:
 - a. the company identification for each material employed by emissions unit K010;
 - b. the number of gallons of each material employed by emissions unit K010;
 - c. the OC content of each material employed by emissions unit K010, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all emissions unit K010, in pounds per day; and
 - f. the average hourly OC emission rate for all materials employed by emissions unit K010.
2. The permittee shall collect and record the following information each month for emissions unit K010:
 - a. the name and identification of each material employed by emissions unit K010;
 - b. the OC content for each material employed by emissions unit K010, in pounds

Issued: To be entered upon final issuance

- per gallon, excluding water and exempt solvents, as applied;
- c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by K010, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month

**Horto
PTI A**Emissions Unit ID: **K010****Issued: To be entered upon final issuance**

period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions exceeded 0.54 lb/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions exceeded 24 lbs/day, and the actual OC emissions for each such day;
 - c. the rolling 12-month material usage limitation;
 - d. the sum of the total OC emissions rates for all materials employed by emissions unit K010 in tons per rolling, 12-month period;
 - e. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - f. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:
 - a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 0.54 lbs/hr and 24 lbs/day .

Emissions Unit ID: **K010**

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPS from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

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

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 0.5 ton per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based record keeping requirements as specified in C.2 above.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 183 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

82

Horto

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K010**

Horto
PTI A

Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K011 - Fabrication area coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit coats parts and cleans up parts and partially assembled motor vehicles.)</u>	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 40 lbs/day. Compliance with this rule also includes compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are equivalent or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	Organic compound (OC) emissions from this emissions unit shall not exceed 4.2 tons per rolling 12-month period.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.
		Emissions of all HAPs from all materials employed by emissions units K001

Horton Emergency Vehicle Company
PTI Application: 01-08060
Issue

Facility ID: 0125042195

Emissions Unit ID: K011

through K013 and P001
shall not exceed 19.8
tons per rolling 12-month
period.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions****2.a** none**B. Operational Restrictions**

1. 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 annual coating usage for this emissions unit shall not exceed 1497 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 clean up material usage, upon issuance of this permit. The maximum annual clean up material usage for this emissions unit shall not exceed 41 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.
3. The maximum VOC content of the coating employed by emissions unit K011 shall not exceed 5.43 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of the clean up material employed by emissions unit K011 shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K011:
 - 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 OC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all coatings and cleanup materials employed, in pounds per day; and

Issued: To be entered upon final issuance

- f. the average hourly OC emission rate for all coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for emissions unit K011:
 - a. the name and identification of each material employed by emissions unit K011;
 - b. the OC content for each material employed by emissions unit K011, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total VOC emissions from all materials employed by K011, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);

Issued: To be entered upon final issuance

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 1.67 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - c. the rolling 12-month coating usage limitation;
 - d. the rolling 12-month cleanup material usage limitation;
 - e. the sum of the total VOC emissions rates for all coating and cleanup material employed by emissions unit K011 in tons per rolling, 12-month period;
 - f. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
 - g. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:

- a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 1.67 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

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

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 4.2 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record

**Horto
PTI A**

Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

keeping requirements as specified in C.2 above.

- f. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 1497 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 41 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-09(U)(2)(e)
K012 - Delivery area coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit attaches parts to, and cleans up, motor vehicles.)</u>	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	

Horto

PTI A

Emissions Unit ID: **K012**

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

See A.2.a below.

Volatile Organic
Compounds (VOC)
emissions from shall not
exceed 2.67 lbs/hr.

The requirements of this
rule also include
compliance with the
requirements of OAC
rules
3745-21-09(U)(2)(e),
3745-31-05(C) and
3745-35-07(B).

See Section A.2.a below.

VOC emissions from this
emissions unit shall not
exceed 5.66 tons per
rolling 12- month period.

Emissions of any single
hazardous air pollutant
(HAP) from all materials
employed by emissions
units K001 through K013
and P001 shall not
exceed 9.85 tons per
rolling 12-month period.

Emissions of all HAPS
from all materials
employed by emissions
units K001 through K013
and P001 shall not
exceed 19.8 tons per
rolling 12-month period.

92

Horto

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K012**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the emissions unit never uses more than 10 gallons per day when coating miscellaneous metal parts.
- 2.b** The hourly allowable emissions limitation for this emissions unit were established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. 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 clean up material usage, upon issuance of this permit. The maximum annual clean up material usage for this emissions unit shall not exceed 1607 gallons, based upon a rolling, 12 month summation of the clean up material usage figures.
- 2.. The maximum VOC content of the material employed by emissions unit K012 shall not exceed 7.05 lbs of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K012:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions unit K012:
 - a. the name and identification of each material employed by emissions unit K012;
 - b. the VOC content for each material employed by emissions unit K012, in pounds

Issued: To be entered upon final issuance

- per gallon, excluding water and exempt solvents, as applied;
- c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total VOC emissions from all materials employed by K012, in tons per rolling, 12-month period.
2. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month

Emissions Unit ID: **K012**

period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA, Central District Office within 45 days after the exceedance occurs).
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling 12-month cleanup material usage limitation;
 - b. the sum of the total VOC emissions rates for all materials employed by emissions unit K012 in tons per rolling, 12-month period;
 - c. the total emissions of each individual HAP from all materials, employed by emissions units K001 through K013 and P001, in tons per rolling, 12-month period; and
 - e. the total emissions of all HAPs for emissions units K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:
 - a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions from this

**Horto
PTI A**Emissions Unit ID: **K012****Issued: To be entered upon final issuance**

emissions unit shall not exceed 2.67 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- b. Emission Limitation: VOC emissions shall not exceed 5.66 tons per rolling 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emission Limitation: Emissions of all HAPS from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- e. Emissions Limitation: The maximum VOC content of the material employed by emissions unit K005 shall not exceed 7.05 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

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

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 1607 gallons, based upon a rolling, 12 month

Horton Emergency Vehicle Company
PTI Application: 01-08060
Issue:

Facility ID: 0125042195

Emissions Unit ID: **K012**

summation of the clean up material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

**Horto
PTI A**

Emissions Unit ID: **K013**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K013 - Paint department - miscellaneous preparation coating operation - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. (<u>This emissions unit coats and cleans motor vehicles.</u>)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	

Horto**PTI A**Emissions Unit ID: **K013****Issued: To be entered upon final issuance**

Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.
Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 1.67 lbs/hr.	See A.2.a below.
Particulate emissions (PE) shall not exceed 2.41 tons per year.	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
Compliance with this rule also includes compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), 3745-21-09(U)(2)(e), 3745-31-05(C) and 3745-35-07(B).	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
VOC emissions from coatings and cleanup materials from this emissions unit shall not exceed 7.29 tons per rolling 12- month period.	
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.	

**Horto
PTI A**

Emissions Unit ID: **K013**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the emissions unit never uses more than 10 gallons per day when coating miscellaneous metal parts.
- 2.b** The particulate emission limitations specified in Section A.I.1. reflect the emission unit's potential to emit for this pollutant. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with this emission limitation.

B. Operational Restrictions

1. 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 annual coating usage for this emissions unit shall not exceed 432 gallons, based upon a rolling, 12 month summation of the coating usage figures.
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 cleanup material usage, upon issuance of this permit. The maximum annual cleanup material usage for this emissions unit shall not exceed 2056 gallons, based upon a rolling, 12 month summation of the cleanup material usage figures.
3. The maximum VOC content of cleanup material shall not exceed 7.05 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of any coating, as applied, shall not exceed 0.20 lb of VOC per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit K013:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and

Emissions Unit ID: **K013**

- c. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions unit K013:
 - a. the name and identification of each coating and cleanup material employed by emissions unit K013;
 - b. the VOC content for each coating and cleanup material employed by emissions unit K013, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons employed by K013 of each coating and cleanup material;
 - d. the rolling, 12-month summation of the coating usage, in gallons;
 - e. the rolling, 12-month summation of the cleanup material usage, in gallons; and
 - f. the total VOC emissions from all coatings and cleanup materials employed by K013, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of

**Horto
PTI A**Emissions Unit ID: **K013****Issued: To be entered upon final issuance**

combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 4. 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.

D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
- 2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.
- 3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling 12-month coating usage limitation;

Horton Emergency Vehicle Company**PTI Application: 01-08960****Issue:****Facility ID: 0125042195****Emissions Unit ID: K013**

- b. the rolling 12-month cleanup material usage limitation;
- c. the sum of the total VOC emissions rates for all materials employed by emissions unit K013 in tons per rolling, 12-month period;
- d. the total emissions of each individual HAP from all materials, employed by emissions units K001 through K013 and P001, in tons per rolling, 12-month period; and
- e. the total emissions of all HAPs for emissions units K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

- 4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:

- a. Emissions Limitation: Volatile Organic Compounds (VOC) emissions from coatings and cleanup materials shall not exceed 1.67 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- b. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.

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.

- c. Emission Limitation: PE shall not exceed 2.41 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- d. Emission Limitation: VOC emissions from coatings and cleanup materials shall

**Horto
PTI A**Emissions Unit ID: **K013****Issued: To be entered upon final issuance**

not exceed 7.29 tons per rolling 12- month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- e. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- f. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- g. Emissions Limitation: 0.20 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method: Compliance with the VOC content of the coatings applied in this emissions unit shall be determined through monthly recordkeeping, as specified in Sections C.2.

- h. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 7.05 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

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

- k. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Horton Emergency Vehicle Company**PTI Application: 01-08960****Issue:****Facility ID: 0125042195****Emissions Unit ID: K013**

Applicable Compliance Method: If required, compliance 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).

- I. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 432 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- m. Emissions Limitation: The maximum annual cleanup material usage for this emissions unit shall not exceed 2056 gallons, based upon a rolling, 12 month summation of the cleanup material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

F. Miscellaneous Requirements

None

**Horto
PTI A**

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Paint mix room - The terms of this permit supercede those identified in PTI No. 01-06774 issued November 5, 1997. <u>(This emissions unit mixes paint and cleans paint spray equipment.)</u>	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 1.0 pound per hour and 24 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).
	OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	Organic compound (OC) emissions from this emissions unit shall not exceed 4.38 tons per rolling 12-month period.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12- month period. Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule are equivalent or less stringent than

107

Horto

PTI A

Issued: To be entered upon final issuance

the emission limitations

established pursuant to

OAC rule

3745-31-05(A)(3).

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions****2.a** none**B. Operational Restrictions**

none

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P001:
 - a. the name and identification of each material mixed by emissions unit P001;
 - b. the OC content for each material mixed by emissions unit P001, in pounds per gallon.
 - c. the number of gallons of each material mixed by emissions unit P001;
 - d. the total OC emissions from all materials mixed by emissions unit P001;
 - e. the number of hours of operation; and
 - f. the average hourly OC emission rate based upon 0.02 pounds of OC emitted per pound of OC mixed.
2. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;

- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly organic compound emission rate for this emissions unit exceeded 1 pound per hour, and the actual average hourly organic compound emission rate for each such day;
 - b. each day during which the organic compound emission rate for this emissions unit exceeded 24 pounds per day, and the actual organic compound emission rate for each such day;
 - c. the VOC content of each material employed by emissions unit P001;
 - d. the sum of the total VOC emissions rates for all materials employed by emissions unit P001 in tons per rolling, 12-month period;

**Horto
PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

- e. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K013 and P001, in tons per rolling, 12-month period; and
- d. the total emissions of all HAPs for K001 through K013 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 methods:
 - a. Emissions Limitation: Organic Compounds (OC) emissions from the mixing of all materials shall not exceed 1.0 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1. If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A, as appropriate.
 - b. Emission Limitation: OC emissions from the mixing of all materials shall not exceed 4.38 tons per rolling 12- month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.
 - c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K013 and P001 shall not exceed 9.85 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.
 - d. Emission Limitation: Emissions of all HAPs from all materials employed by

Horto**PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

emissions units K001 through K013 and P001 shall not exceed 19.8 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

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

F. Miscellaneous Requirements

None