

Facility ID: 0215010001 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit K001](#)
[Go to Part II for Emissions Unit K002](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0215010001 Emissions Unit ID: K001 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Three casting paint dip tanks	OAC rule 3745-31-05(A)(3) (PTI 02-20438)	Volatile organic compounds (VOC) emissions shall not exceed 210 pounds per day.
		See section A.2.a below.
	OAC rule 3745-21-09(U)(1)(d)	The VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
	OAC rule 3745-35-07(B)	VOC emissions shall not exceed 15.75 tons per rolling, 12-month period.
	40 CFR Part 63, Subpart M	An individual hazardous air pollutant (HAP) shall not exceed 9.9 tons per rolling, 12-month period and total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period for emissions units F012, K001 and K002.
	40 CFR Part 63, Subpart M	See section A.2.b below.

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(d) and 3745-35-07(B). This emissions unit is not subject to 40 CFR Part 63, Subpart M (MACT for Surface Coating of Miscellaneous Metal Parts). Section 63.3881(c)(1) of this subpart states that this subpart does not apply to a coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to section 63.3941. The Material Safety Data Sheet provided in the application for the coating used in this emissions unit does not include any HAP. If future coatings contain HAP and if the facility is a major source, or is part of a major source of HAP emissions, then this subpart would be applicable per Section 63.3881(b).

B. Operational Restrictions

1. The coating usage shall not exceed 9,000 gallons per rolling, 12-month period.
2. During the first twelve (12) calendar months of operation following the effective date of this federally enforceable state operating permit, the cumulative amount of coating used at this emissions unit shall not exceed the cumulative total number of gallons as specified for each month in the following table:

Month Cumulative Number of Gallons

- 1 750
- 2 1,500
- 3 2,250
- 4 3,000
- 5 3,750

6 4,500
 7 5,250
 8 6,000
 9 6,750
 10 7,500
 11 8,250
 12 9,000

3. The permittee shall cover the dip tanks in order to reduce VOC emissions when this emissions unit is not actively in use.
4. The exhaust fan above one dip tank shall operate at 4,000 cubic feet per minute and shall operate at all times when this emissions unit is in operation.
5. The maximum coating usage rate shall not exceed 2.5 gallons per hour.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating employed;
 - c. the content of each individual HAP, in pounds per gallon, of each coating employed;
 - d. the volume of each coating employed, in gallons;
 - e. the VOC emissions, in pounds per day, as calculated by the following equation:

$$E \text{ (lbs VOC/hour)} = \text{the sum of (A multiplied by B) for each type of coating applied}$$
 where:

$$A = \text{the VOC content, excluding water and exempt solvents, in pounds per gallon; and}$$

$$B = \text{volume of coating employed, in gallons;}$$
 - f. the emissions of each individual HAP, in pounds per day, as calculated by multiplying the individual HAP, in pounds per gallon, with the number of gallons employed during the day;
 - g. the total combined HAP emissions, in pounds per day, calculated by the summation of each individual HAP emissions as calculated in section C.1.f; and
 - h. the average hourly coating usage, in gallons per hour, calculated by dividing the volume of coatings used during the day by the number of operating hours during the day.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total volume of coatings employed, in gallons, during the month;
 - b. the cumulative total volume of coatings employed, in gallons, during the past rolling, 12-month period;
 - c. the VOC emissions, in tons per rolling, 12-month period, as calculated by the summation of daily VOC emissions during each month, multiplied by ton/2,000 lbs;
 - d. the emissions of each individual HAP, in tons per rolling, 12-month period, as calculated by the summation of daily emissions of each individual HAP during each month, multiplied by ton/2,000 lbs; and
 - e. the total combined HAP emissions, in tons per rolling, 12-month period, calculated by the summation of each individual HAP emissions as calculated in section C.2.d.
3. The permittee shall collect and record the following information each month:
 - a. the total emissions of each individual HAP, in tons per rolling, 12-month period, from this emissions unit, F012 (core making), and K002 (casting paint dip tank - yellow). The emissions of each individual HAP from this emissions unit is calculated per section C.2.d of this permit. The emissions of each individual HAP from emissions units F012 and K002 are calculated and recorded as required in the "Monitoring and/or Record Keeping Requirements" section in the Federally Enforceable State Operating Permit for each emissions unit; and
 - b. the total combined HAP emissions, in tons per rolling, 12-month period, from emissions units F012 (core making) and K002 (casting paint dip tank - yellow). The total combined HAP emissions from this emissions unit is calculated per section C.2.e of this permit. The total combined HAP emissions from emissions units F012 and K002 are calculated and recorded as required in the "Monitoring and/or Record Keeping Requirements" section in the Federally Enforceable State Operating Permit for each emissions unit.
4. The permit to install for this emissions unit [K001] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-Butoxyethanol

Maximum Hourly Emission Rate: 3.237 pounds per hour
 TLV: 96,662.58 ug/m³
 MAGLC = TLV/42 = 2,301.5 ug/m³
 Predicted 1-Hour Maximum Ground-Level Concentration: 2-Butoxyethanol

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

D. Reporting Requirements

- The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing use of noncomplying coatings, i.e., coatings exceeding 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month.
- The permittee shall submit quarterly deviation (excursion) reports that include the following information for this emissions unit:
 - an identification of each day during which the VOC emissions were calculated to exceed 210 pounds per day;
 - an identification of each day during which the average hourly coating usage rate exceeded 2.5 gallons per hour;
 - an identification of each day during which VOC content of the coating exceeded 3.5 pounds per gallon;
 - an identification of each month during which the cumulative volume of coatings employed during each month of the first twelve (12) months of operation following issuance of this permit exceeded the stated amounts per section B.2;
 - an identification of each month after the first twelve (12) months of operation following issuance of this permit, during which the cumulative volume of coatings employed during the past rolling, 12-month period exceeded 9,000 gallons;
 - an identification of each month during which the VOC emissions were greater than 15.75 tons per rolling, 12-month period; and
 - an identification of each month during which the HAP emissions from the facility (emissions units F012, K001 and K002) were greater than 9.9 tons per rolling, 12-month period for any individual HAP or greater than 24.9 tons per rolling, 12-month period for total combined HAPs, as recorded per the requirements of section C.3.

The calendar quarters are January 1 - March 31, April 1 - June 30, July 1 - September 30, and October 1 - December 31. The quarterly deviation reports shall be submitted to the Ohio EPA Northeast District Office quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

If no deviations occurred during a calendar quarter, the permittee shall still submit a quarterly report which states that no deviations occurred during the quarter.

E. Testing Requirements

- Compliance with the emission limitations and operational restrictions in sections A and B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

Emission Limitation:

VOC emissions shall not exceed 210 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

Emission Limitation:

VOC emissions shall not exceed 15.75 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

Emission Limitation:

An individual HAP shall not exceed 9.9 tons per rolling, 12-month period and total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period for emissions unit F012, K001 and K002.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

Operational Restriction:

The coating usage shall not exceed 9,000 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

Operational Restriction:

The maximum coating usage rate shall not exceed 2.5 gallons per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

F. **Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C.1, C.2, C.3, D and E of this permit are federally enforceable.
2. On April 20, 2006, a Federally Enforceable State Operating Permit (FESOP) was issued for this facility that included emissions units F007-9, F012, K001, P003-5 and P901-2. The terms and conditions for the FESOP issued on April 20, 2006 and the terms and conditions for emissions units K001 and K002, together, shall constitute the overall FESOP strategy for this facility. As such, the expiration date for this FESOP for emissions units K001 and K002 shall be April 20, 2011 so that all applicable emissions units at this facility can be coordinated into one FESOP at the time of renewal.

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Facility ID: 0215010001 Emissions Unit ID: K002 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or

control measures (if any) may 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>
Casting paint dip tank - yellow	OAC rule 3745-31-05(A)(3) (PTI 02-21767)	See sections A.2.a, A.2.b, A.2.c and A.2.d below.
	OAC rule 3745-21-09(U)(1)(d)	The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B)	See sections A.2.c and A.2.d below.
	40 CFR Part 63, Subpart M	See section A.2.e below.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 0.6 pound per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
 VOC emissions shall not exceed 2.9 pounds per day.
 VOC emissions shall not exceed 0.54 ton per rolling, 12-month period.
 An individual hazardous air pollutant (HAP) shall not exceed 9.9 tons per rolling, 12-month period and total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period for emissions units F012, K001 and K002.
 This emissions unit is not subject to 40 CFR Part 63, Subpart M (MACT for Surface Coating of Miscellaneous Metal Parts). Section 63.3881(c)(1) of this subpart states that this subpart does not apply to a coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to section 63.3941. The Material Safety Data Sheet provided in the application for the coating used in this emissions unit does not include any HAP. If future coatings contain HAP and if the facility is a major source, or is part of a major source of HAP emissions, then this subpart would be applicable per Section 63.3881(b).

B. Operational Restrictions

- 1. The coating usage shall not exceed 1,800 gallons per rolling, 12-month period.
- 2. During the first twelve (12) calendar months of operation following the effective date of this Federally Enforceable State Operating Permit, the cumulative amount of coating used at this emissions unit shall not exceed the cumulative total number of gallons as specified for each month in the following table:

Month Cumulative Number of Gallons

- 1 150
- 2 300
- 3 450
- 4 600
- 5 750
- 6 900
- 7 1,050
- 8 1,200
- 9 1,350
- 10 1,500
- 11 1,650
- 12 1,800

- 3. The permittee shall cover the dip tank in order to reduce VOC emissions when this emissions unit is not actively in use.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating employed;
 - c. the content of each individual HAP, in pounds per gallon, of each coating employed;
 - d. the volume of each coating employed, in gallons;
 - e. the VOC emissions, in pounds per day, as calculated by the following equation:

$$E \text{ (lbs VOC/day)} = \text{the sum of (A multiplied by B) for each type of coating applied}$$
 where:
 A = the VOC content, excluding water and exempt solvents, in pounds per gallon; and
 B = volume of coating employed, in gallons per day;
 - f. the emissions of each individual HAP, in pounds per day, as calculated by multiplying the individual HAP, in pounds per gallon, with the number of gallons employed during the day; and
 - g. the total combined HAP emissions, in pounds per day, calculated by the summation of each individual HAP emissions as calculated in section C.1.f.
- 2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total volume of coatings employed, in gallons, during the month;

- b. the cumulative total volume of coatings employed, in gallons, during the past rolling, 12-month period;
 - c. the VOC emissions, in tons per rolling, 12-month period, as calculated by the summation of daily VOC emissions during each month, multiplied by ton/2,000 lbs;
 - d. the emissions of each individual HAP, in tons per rolling, 12-month period, as calculated by the summation of daily emissions of each individual HAP during each month, multiplied by ton/2,000 lbs; and
 - e. the total combined HAP emissions, in tons per rolling, 12-month period, calculated by the summation of each individual HAP emissions as calculated in section C.2.d.
3. The permittee shall collect and record the following information each month:
- a. the total emissions of each individual HAP, in tons per rolling, 12-month period, from this emissions unit, F012 (Core Making) and K001 (Three dip tanks). The emissions of each individual HAP from this emissions unit is calculated per section C.2.d of this permit. The emissions of each individual HAP from emissions units F012 and K001 are calculated and recorded as required in the "Monitoring and/or Record Keeping Requirements" section in the Federally Enforceable State Operating Permit for each emissions unit; and
 - b. the total combined HAP emissions, in tons per rolling, 12-month period, from this emissions unit, F012 (Core Making), and K001 (Three dip tanks). The total combined HAP emissions from this emissions unit is calculated per section C.2.e of this permit. The total combined HAP emissions from emissions units F012 and K001 are calculated and recorded as required in the "Monitoring and/or Record Keeping Requirements" section in the Federally Enforceable State Operating Permit for each emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing use of noncomplying coatings, i.e., coatings exceeding 0.6 pound VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this emissions unit:
 - a. an identification of each day during which the VOC emissions were calculated to exceed 2.9 pounds per day;
 - b. an identification of each day during which VOC content of the coating exceeded 0.6 pound per gallon;
 - c. an identification of each month during which the VOC emissions were calculated to exceed 0.54 ton per rolling, 12-month period;
 - d. an identification of each month during which the cumulative volume of coatings employed during each month of the first twelve (12) months of operation following issuance of this permit exceeded the stated amounts per section B.2;
 - e. an identification of each month after the first twelve (12) months of operation following issuance of this permit, during which the cumulative volume of coatings employed during the past rolling, 12-month period exceeded 1,800 gallons; and
 - f. an identification of each month during which the HAP emissions from the facility (emissions units F012, K001 and K002) were greater than 9.9 tons per rolling, 12-month period for any individual HAP or greater than 24.9 tons per rolling, 12-month period for total combined HAPs, as recorded per the requirements of section C.3.

The calendar quarters are January 1 - March 31, April 1 - June 30, July 1 - September 30, and October 1 - December 31. The quarterly deviation reports shall be submitted to the Ohio EPA Northeast District Office quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

If no deviations occurred during a calendar quarter, the permittee shall still submit a quarterly report which states that no deviations occurred during the quarter.

E. Testing Requirements

1. Compliance with the emission limitations in sections A and B of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

The VOC content shall not exceed 0.6 pound per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
Emission Limitation:

VOC emissions shall not exceed 2.9 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.
Emission Limitation:

VOC emissions shall not exceed 0.54 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.
Emission Limitation:

An individual HAP shall not exceed 9.9 tons per rolling, 12-month period and total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period for emissions units F012, K001 and K002.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.
Emission Limitation:

The coating usage shall not exceed 1,800 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

F. **Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D and E of this permit are federally enforceable.
2. On April 20, 2006, a Federally Enforceable State Operating Permit (FESOP) was issued for this facility that included emissions units F007-9, F012, K001, P003-5 and P901-2. The terms and conditions for the FESOP issued on April 20, 2006 and the terms and conditions for emissions units K001 and K002, together, shall constitute the overall FESOP strategy for this facility. As such, the expiration date for this FESOP for emissions units K001 and K002 shall be April 20, 2011 so that all applicable emissions units at this facility can be coordinated into one FESOP at the time of renewal.