State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
KNOX COUNTY

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 01-08856
Fac ID: 0142010112
DATE: 9/28/2004

Rolls-Royce Energy Systems, Inc
Louis Burcsak
105 N Sandusky St
Mount Vernon, OH 43050

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

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

cc: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 9/28/2004**
Terms and Conditions	**Effective Date: 9/28/2004**

FINAL PERMIT TO INSTALL 01-08856

Application Number:	01-08856
Facility ID:	0142010112
Permit Fee:	**$1000**
Name of Facility:	Rolls-Royce Energy Systems, Inc
Person to Contact:	Louis Burcsak
Address:	105 N Sandusky St Mount Vernon, OH 43050

Location of proposed air contaminant source(s) [emissions unit(s)]:
105 N Sandusky St
Mount Vernon, **Ohio**

Description of proposed emissions unit(s):
Paint booths.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources 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 Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

Pollutant	Tons Per Year
VOC	39.8
single HAP	8.30
combined HAPs	12.3

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R001 - Paint booth for miscellaneous metal parts with fabric filter (110-S-01)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)(iii)
	OAC rule 3745-35-07(B) OAC rule 3745-31-05(C)	

Applicable Emissions Limitations/Control Measures	
	combined shall not exceed 12.3 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.
Volatile organic compound (VOC) emissions shall not exceed 3.2 pounds per hour, excluding cleanup material.	See B.2, B.3, B.4 and B.5 below.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(U).	See B.1. below.
See A.2.a. below.	
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Single hazardous air pollutant (HAP) emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Total combined HAPs emissions from R001, R005, R006, R007 and R008	

2. Additional Terms and Conditions

2.a The hourly mass emission limitation in term A.1 was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The total maximum daily coating usage for this emissions unit (R001) shall not exceed 10 gallons per day.

2. The VOC content of any coating used in this emissions unit shall not exceed 6.4 pounds of VOC per gallon, excluding water and exempt solvents, as applied.

3. The VOC content of any cleanup material used in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.

4. The total maximum annual coating usage for R001, R005, R006, R007 and R008 combined shall not exceed 12,045 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.

5. The total maximum annual cleanup material usage for R001, R005, R006, R007 and R008 combined shall not exceed 3470 gallons per rolling, 12-month summation of the cleanup material usage figures. The permittee has existing cleanup usage records and therefore does not need to be limited during the first year on a monthly basis.

6. The permittee shall maintain a minimum stack height of twenty-seven (27) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Record keeping Requirements

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

   a. the name and identification of each coating employed, as applied;

   b. the volume, in gallons, of each coating employed; and

   c. the total volume, in gallons, of all coatings employed.

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 and cleanup material, as applied;

   b. the VOC content of each coating, excluding water and exempt solvents in pounds VOC per gallon coating, as applied;

   c. the VOC content of each cleanup material in pounds VOC per gallon cleanup material, as applied;

   d. the individual hazardous air pollutant (HAP)[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

   e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

   f. 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 d);

   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 e);

   h the total coating usage for the emissions unit, in gallons;

   i. the total cleanup material usage for the emissions unit, in gallons;

   j. the VOC emissions from all coating and cleanup material used in this emissions unit, in pounds or tons of VOC (the sum of b time h for each coating and the sum of c times i for each cleanup material);

   k. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP (for each HAP, the sum of d times h for each coating and the sum of e times i for each cleanup material);

   l. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs (the sum of f times h for each coating and the sum of g times i for each cleanup material);

   m. the rolling, 12-month summation of monthly coating usage from emissions units R001,

R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

n. the rolling, 12-month summation of the monthly cleanup material usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period; and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period.

[1]A 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 permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 2.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 68.4
MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.78
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):23.4
MAGLC (ug/m3): 4476

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

4. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the emissions unit employs more than the applicable maximum daily coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) 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 VOC content limit for coating material;

   b. the VOC content limit for cleanup materials limitation;

   c. the rolling, 12-month coating usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   d. the rolling, 12-month cleanup material usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   e. the rolling, 12-month VOC emission limitation from emissions units R001, R005, R006, R007 and R008 combined;

   f. the rolling, 12-month total individual HAP emission limitation from emissions units R001, R005, R006, R007 and R008 combined; and

   g. the rolling, 12-month total combined HAP emissions limitation from emissions units R001, R005, R006, R007 and R008 combined.

3. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office 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 submit a report which states that no deviations occurred during the calendar quarter.

4. The permittee shall submit annual reports which specify the total VOC and HAP emissions from

this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

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

   a. Emission Limitation:
   VOC emissions shall not exceed 3.2 pounds per hour, excluding cleanup materials.

   Applicable Compliance Method:
   Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (0.5 gallon per hour, PTI application 04/14/2004) by the maximum VOC content of the coating (6.4 pounds VOC per gallon, PTI application 04/14/2004), in pounds VOC per gallon.

   b. Emission Limitation:
   VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per rolling, 12-month summation, including cleanup materials.

   Applicable Compliance Method:
   Compliance shall be demonstrated by record keeping requirement C.2.o.

   c. Emission Limitation:
   Single HAP emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per rolling, 12-month summation, including cleanup materials.

   Applicable Compliance Method:
   Compliance shall be demonstrated by record keeping requirement C.2.p.

   d. Emission Limitation:
   Total combined HAP emissions R001, R005, R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup materials.

   Applicable Compliance Method:
   Compliance shall be demonstrated by record keeping requirement C.2.q.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R005 - Paint booth for miscellaneous metal parts with fabric filter (141-S-01) (Terms in this permit supersede those identified in PTI 01-04002 issued on 08/09/1992 for this emissions unit)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(b)
	OAC rule 3745-35-07(B) OAC rule 3745-31-05(C)	

Applicable Emissions Limitations/Control Measures	
Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour, excluding cleanup material.	R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(U).	See B.2, B.3, and B.4 below.
See A.2.a below.	See B.1 below.
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Single hazardous air pollutant (HAP) emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Total combined HAPs emissions from R001, R005,	

2. Additional Terms and Conditions

2.a The hourly mass emission limitation in term A.1 was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The VOC content of any coating used in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

2. The VOC content of any cleanup material used in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.

3. The total maximum annual coating usage for R001, R005, R006, R007 and R008 combined shall not exceed 12,045 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.

4. The total maximum annual cleanup material usage for R001, R005, R006, R007 and R008 combined shall not exceed 3470 gallons per rolling, 12-month summation of the cleanup material usage figures. The permittee has existing cleanup usage records and therefore does not need to be limited during the first year on a monthly basis.

5. The permittee shall maintain a minimum stack height of twenty-eight (28) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the VOC content of each coating, excluding water and exempt solvents in pounds VOC per gallon coating, as applied;

   c. the VOC content of each cleanup material in pounds VOC per gallon cleanup material, as applied;

d. the individual hazardous air pollutant (HAP)[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

f. 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 d);

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 e);

h the total coating usage for the emissions unit, in gallons;

i. the total cleanup material usage for the emissions unit, in gallons;

j. the VOC emissions from all coating and cleanup material used in this emissions unit, in pounds or tons of VOC (the sum of b time h for each coating and the sum of c times i for each cleanup material);

k. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP (for each HAP, the sum of d times h for each coating and the sum of e times i for each cleanup material);

l. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs (the sum of f times h for each coating and the sum of g times i for each cleanup material);

m. the rolling, 12-month summation of monthly coating usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

n. the rolling, 12-month summation of the monthly cleanup material usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units R001, R005, R006, R007 and

R008 combined, in pounds or tons per rolling, 12-month period; and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period.

[1]A 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.

2. The permit to install for this emissions unit (R005) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 3.45
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49.0
MAGLC (ug/m3): 10,333

Pollutant: Toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 5.49
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 78.0
MAGLC (ug/m3): 4476

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the VOC content limit for coating material;

   b. the VOC content limit for cleanup materials limitation;

   c. the rolling, 12-month coating usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   d. the rolling, 12-month cleanup material usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   e. the rolling, 12-month VOC emission limitation from emissions units R001, R005, R006, R007 and R008 combined;

   f. the rolling, 12-month total individual HAP emission limitation from emissions units R001, R005, R006, R007 and R008 combined; and

   g. the rolling, 12-month total combined HAP emissions limitation from emissions units R001, R005, R006, R007 and R008 combined.

3. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office 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 submit a report which states that no deviations occurred during the calendar quarter.

4. The permittee shall submit annual reports which specify the total VOC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

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

   a. Emission Limitation:
   VOC emissions shall not exceed 20.0 pounds per hour, excluding cleanup materials.

   Applicable Compliance Method:
   Compliance with the short term limitation shall be demonstrated by multiplying the

maximum amount of coating used per hour (5 gallons per hour, PTI application 04/14/2004) by the maximum VOC content of the coating (4.0 pounds VOC per gallon, PTI application 04/14/2004) in pounds VOC per gallon.

b. Emission Limitation:
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.o.

c. Emission Limitation:
Single HAP emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.p.

d. Emission Limitation:
Total combined HAP emissions R001, R005, R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.q.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R006 - Paint booth for miscellaneous metal parts with fabric filter (50-S-01) (Terms in this permit supersede those identified in PTI 01-04104 issued on 07/08/1993 for this emissions unit)	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-21-09(U)(1)(b)
	OAC rule 3745-35-07(B) OAC rule 3745-31-05(C)	

Applicable Emissions Limitations/Control Measures	
	combined shall not exceed 12.3 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.
Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour, excluding cleanup material.	See B.2, B.3, and B.4 below.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(U).	See B.1 below.
See A.2.a below.	
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Single hazardous air pollutant (HAP) emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Total combined HAPs emissions from R001, R005, R006, R007 and R008	

2. Additional Terms and Conditions

2.a The hourly mass emission limitation in term A.1 was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The volatile organic compound (VOC) content of any coating used in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

2. The VOC content of any cleanup material used in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.

3. The total maximum annual coating usage for R001, R005, R006, R007 and R008 combined shall not exceed 12,045 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.

4. The total maximum annual cleanup material usage for R001, R005, R006, R007 and R008 combined shall not exceed 3470 gallons per rolling, 12-month summation of the cleanup material usage figures. The permittee has existing cleanup usage records and therefore does not need to be limited during the first year on a monthly basis.

5. The permittee shall maintain a minimum stack height of twenty-eight (28) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the VOC content of each coating, excluding water and exempt solvents in pounds VOC per gallon coating, as applied;

   c. the VOC content of each cleanup material in pounds VOC per gallon cleanup material, as applied;

d. the individual hazardous air pollutant (HAP)[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

f. 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 d);

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 e);

h the total coating usage for the emissions unit, in gallons;

i. the total cleanup material usage for the emissions unit, in gallons;

j. the VOC emissions from all coating and cleanup material used in this emissions unit, in pounds or tons of VOC (the sum of b time h for each coating and the sum of c times i for each cleanup material);

k. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP (for each HAP, the sum of d times h for each coating and the sum of e times i for each cleanup material);

l. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs (the sum of f times h for each coating and the sum of g times i for each cleanup material);

m. the rolling, 12-month summation of monthly coating usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

n. the rolling, 12-month summation of the monthly cleanup material usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period; and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period.

[1]A 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.

2. The permit to install for this emissions unit (R006) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 3.45
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49.0
MAGLC (ug/m3): 10,333

Pollutant: Toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 5.49
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 78.0
MAGLC (ug/m3): 4476

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters

used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar

month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the VOC content limit for coating material;

   b. the VOC content limit for cleanup materials limitation;

   c. the rolling, 12-month coating usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   d. the rolling, 12-month cleanup material usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   e. the rolling, 12-month VOC emission limitation from emissions units R001, R005, R006, R007 and R008 combined;

   f. the rolling, 12-month total individual HAP emission limitation from emissions units R001, R005, R006, R007 and R008 combined; and

   g. the rolling, 12-month total combined HAP emissions limitation from emissions units R001, R005, R006, R007 and R008 combined.

3. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office 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 submit a report which states that no deviations occurred during the calendar quarter.

4. The permittee shall submit annual reports which specify the total VOC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

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

   a. Emission Limitation:
   VOC emissions shall not exceed 20.0 pounds per hour, excluding cleanup materials.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (5 gallons per hour, PTI application 04/14/2004) by the maximum VOC content of the coating (4.0 pounds VOC per gallon, PTI application 04/14/2004) in pounds VOC per gallon.

b. Emission Limitation:
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.o.

c. Emission Limitation:
Single HAP emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.p.

d. Emission Limitation:
Total combined HAP emissions R001, R005, R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.q.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R007 - Paint booth for miscellaneous metal parts with fabric filter (24-S-02) (Terms in this permit supersede those identified in PTI 01-04924 issued on 12/07/1994 for this emissions unit)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)(iii)
	OAC rule 3745-35-07(B) OAC rule 3745-31-05(C)	

Applicable Emissions Limitations/Control Measures	
	combined shall not exceed 12.3 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.
Volatile organic compound (VOC) emissions shall not exceed 4.5 pounds per hour, excluding cleanup material.	See B.2, B.3, B.4 and B.5 below.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(U).	See B.1. below.
See A.2.a below.	
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Single hazardous air pollutant (HAP) emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Total combined HAPs emissions from R001, R005, R006, R007 and R008	

2. Additional Terms and Conditions

2.a The hourly mass emission limitation in term A.1 was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The total maximum daily coating usage for this emissions unit (R007) shall not exceed 10 gallons per day.

2. The VOC content of any coating used in this emissions unit shall not exceed 4.5 pounds of VOC per gallon, excluding water and exempt solvents, as applied.

3. The VOC content of any cleanup material used in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.

4. The total maximum annual coating usage for R001, R005, R006, R007 and R008 combined shall not exceed 12,045 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.

5. The total maximum annual cleanup material usage for R001, R005, R006, R007 and R008 combined shall not exceed 3470 gallons per rolling, 12-month summation of the cleanup material usage figures. The permittee has existing cleanup usage records and therefore does not need to be limited during the first year on a monthly basis.

6. The permittee shall maintain a minimum stack height of thirty (30) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Record keeping Requirements

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

   a. the name and identification of each coating employed, as applied;

   b. the volume, in gallons, of each coating employed; and

   c. the total volume, in gallons, of all coatings employed.

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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 and cleanup material, as applied;

   b. the VOC content of each coating, excluding water and exempt solvents in pounds VOC per gallon coating, as applied;

   c. the VOC content of each cleanup material in pounds VOC per gallon cleanup material, as applied;

   d. the individual hazardous air pollutant (HAP)[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

   e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

   f. 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 d);

   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 e);

   h the total coating usage for the emissions unit, in gallons;

   i. the total cleanup material usage for the emissions unit, in gallons;

   j. the VOC emissions from all coating and cleanup material used in this emissions unit, in pounds or tons of VOC (the sum of b time h for each coating and the sum of c times i for each cleanup material);

   k. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP (for each HAP, the sum of d times h for each coating and the sum of e times i for each cleanup material);

   l. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs (the sum of f times h for each coating and the sum of g times i for each cleanup material);

   m. the rolling, 12-month summation of monthly coating usage from emissions units R001,

R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

n. the rolling, 12-month summation of the monthly cleanup material usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period; and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period.

[1]A 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 permit to install for this emissions unit (R007) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 0.61
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 224.5
MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.23
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 128.9
MAGLC (ug/m3): 4476

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

4. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the emissions unit employs more than the applicable maximum daily coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) 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 VOC content limit for coating material;

   b. the VOC content limit for cleanup materials limitation;

   c. the rolling, 12-month coating usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   d. the rolling, 12-month cleanup material usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   e. the rolling, 12-month VOC emission limitation from emissions units R001, R005, R006, R007 and R008 combined;

   f. the rolling, 12-month total individual HAP emission limitation from emissions units R001, R005, R006, R007 and R008 combined; and

   g. the rolling, 12-month total combined HAP emissions limitation from emissions units R001, R005, R006, R007 and R008 combined.

3. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office 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 submit a report which states that no deviations occurred during the calendar quarter.

4. The permittee shall submit annual reports which specify the total VOC and HAP emissions from

this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

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

   a. Emission Limitation:
   VOC emissions shall not exceed 4.5 pounds per hour, excluding cleanup materials.

   Applicable Compliance Method:
   Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (1.0 gallon per hour, PTI application 04/14/2004) by the maximum VOC content of the coating (4.5 pounds VOC per gallon, PTI application 04/14/2004), in pounds VOC per gallon.

b. Emission Limitation:
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.2.o.

c. Emission Limitation:
Single HAP emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.2.p.

d. Emission Limitation:
Total combined HAP emissions R001, R005, R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.2.q.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R008 - Paint booth for miscellaneous metal parts with fabric filter (81-S-02) (Terms in this permit supersede those identified in PTI 01-08460 issued on 10/23/2001 for this emissions unit)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(b)
	OAC rule 3745-35-07(B) OAC rule 3745-31-05(C)	

Applicable Emissions Limitations/Control Measures	
Volatile organic compound (VOC) emissions shall not exceed 50.0 pounds per hour, excluding cleanup material.	R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(U).	See B.2, B.3, and B.4 below.
See A.2.a below.	See B.1 below.
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Single hazardous air pollutant (HAP) emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per year, including cleanup material, based on a rolling 12-month summation of monthly emissions.	
Total combined HAPs emissions from R001, R005,	

2. Additional Terms and Conditions

2.a The hourly mass emission limitation in term A.1 was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The VOC content of any coating used in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

2. The VOC content of any cleanup material used in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.

3. The total maximum annual coating usage for R001, R005, R006, R007 and R008 combined shall not exceed 12,045 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.

4. The total maximum annual cleanup material usage for R001, R005, R006, R007 and R008 combined shall not exceed 3470 gallons per rolling, 12-month summation of the cleanup material usage figures. The permittee has existing cleanup usage records and therefore does not need to be limited during the first year on a monthly basis.

5. The permittee shall maintain a minimum stack height of twenty-two (22) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the VOC content of each coating, excluding water and exempt solvents in pounds VOC per gallon coating, as applied;

   c. the VOC content of each cleanup material in pounds VOC per gallon cleanup material, as applied;

d. the individual hazardous air pollutant (HAP)[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

f. 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 d);

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 e);

h the total coating usage for the emissions unit, in gallons;

i. the total cleanup material usage for the emissions unit, in gallons;

j. the VOC emissions from all coating and cleanup material used in this emissions unit, in pounds or tons of VOC (the sum of b time h for each coating and the sum of c times i for each cleanup material);

k. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP (for each HAP, the sum of d times h for each coating and the sum of e times i for each cleanup material);

l. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs (the sum of f times h for each coating and the sum of g times i for each cleanup material);

m. the rolling, 12-month summation of monthly coating usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

n. the rolling, 12-month summation of the monthly cleanup material usage from emissions units R001, R005, R006, R007 and R008 combined, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units R001, R005, R006, R007 and

R008 combined, in pounds or tons per rolling, 12-month period; and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units R001, R005, R006, R007 and R008 combined, in pounds or tons per rolling, 12-month period.

[1]A 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.

2. The permit to install for this emissions unit (R008) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 18.45
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4783
MAGLC (ug/m3): 10,333

Pollutant: Toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 14.61
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3789
MAGLC (ug/m3): 4476

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the VOC content limit for coating material;

   b. the VOC content limit for cleanup materials limitation;

   c. the rolling, 12-month coating usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   d. the rolling, 12-month cleanup material usage limitation from emissions units R001, R005, R006, R007 and R008 combined;

   e. the rolling, 12-month VOC emission limitation from emissions units R001, R005, R006, R007 and R008 combined;

   f. the rolling, 12-month total individual HAP emission limitation from emissions units R001, R005, R006, R007 and R008 combined; and

   g. the rolling, 12-month total combined HAP emissions limitation from emissions units R001, R005, R006, R007 and R008 combined.

3. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office 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 submit a report which states that no deviations occurred during the calendar quarter.

4. The permittee shall submit annual reports which specify the total VOC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

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

   a. Emission Limitation:
   VOC emissions shall not exceed 50.0 pounds per hour, excluding cleanup materials.

   Applicable Compliance Method:
   Compliance with the short term limitation shall be demonstrated by multiplying the

maximum amount of coating used per hour (12.5 gallons per hour, PTI application 04/14/2004) by the maximum VOC content of the coating (4.0 pounds VOC per gallon, PTI application, 04/04/2004), in pounds VOC per gallon.

b. Emission Limitation:
VOC emissions from R001, R005, R006, R007 and R008 combined shall not exceed 39.8 tons per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.o.

c. Emission Limitation:
Single HAP emissions from R001, R005, R006, R007 and R008 combined shall not exceed 8.30 ton per rolling, 12-month summation, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.p.

d. Emission Limitation:
Total combined HAP emissions R001, R005, R006, R007 and R008 combined shall not exceed 12.3 tons per year, including cleanup materials.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.q.

F. Miscellaneous Requirements

None