State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
ASHTABULA 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: 02-14529

DATE: 6/28/2001

Ashtabula Rubber Co Inc
Art Allcock
2751 West Ave
Ashtabula, OH 44004

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 6/28/2001**
Terms and Conditions	**Effective Date: 6/28/2001**

FINAL PERMIT TO INSTALL 02-14529

Application Number:	02-14529
APS Premise Number:	0204010065
Permit Fee:	**$200**
Name of Facility:	Ashtabula Rubber Co Inc
Person to Contact:	Art Allcock
Address:	2751 West Ave Ashtabula, OH 44004

Location of proposed air contaminant source(s) [emissions unit(s)]:
2751 West Ave
Ashtabula, **Ohio**

Description of proposed emissions unit(s):
Spray booth for applying adhesive to metal parts.

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 Related to Monitoring and Recordkeeping 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new

or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(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	29.7
OC*	32.0

*includes VOC emissions

Emissions Unit ID: **R002**

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	Applicable Emissions Limitations/Control Measures
R002 - Paashe, automatic spray booth for coating metal parts with adhesives for the bonding of rubber parts.	OAC rule 3745-31-05(A)(3)	Compliance with the Air Toxics Policy, as specified in C.5. thru C.8. below. See A.2.a, A.2.b and A.2.d. below. 13.4 tons per year of volatile organic compound emissions from coatings. 0.48 ton per year of organic compound emissions from cleanup materials.
	OAC rule 3745-21-09(U)(2)(f)	See A.2.a and A.2.b. below.
	OAC rule 3745-35-07(B)	See A.2.c. below.

2. Additional Terms and Conditions

2.a This emissions unit, R002, shall employ no more than 10 gallons per day of coating. Emissions units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

2.b The VOC content of coatings employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

Emissions Unit ID: **R002**

The permittee shall continue to research potential "lower solvent" adhesives for implementation in this emissions unit. The above allowable VOC per gallon applies to the coating of miscellaneous metal products with adhesives exclusively.

2.c Facility wide emissions from R002, R003, R004, R006 and R007 shall not exceed the following limits:

i. 9.90 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

ii. 24.90 tons per year of total, combined HAPs, based upon a rolling, 12-month summation.

2.d The permittee shall not use cleanup material which contains HAPs.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emission unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep the following daily records to ensure compliance with the daily, coating limitation:

a. The name and identification number of each coating employed.

b. The amount of each coating employed, in gallons per day.

c. The total amount of coatings employed in this emissions unit, in gallons per day.

d. The total combined amount of coatings employed in emissions units R002, R003, R004 and R007, in gallons per day.

2. The permittee shall keep the following monthly records to ensure compliance with the VOC, OC and HAP emission limits:

a. For each coating and cleanup material used in this emissions unit:

i. The name and identification number of each coating and cleanup material employed;

ii. The VOC content of each coating employed, in pounds of VOC per gallon of coating as applied, excluding water and exempt solvents;

iii. The amount of each coating used, "CT", in gallons per month;

iv. The amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

v. The amount of each, single HAP in each coating and clean up material, in pounds per gallon;

vi. VOC content of each coating applied, in pounds of VOC per gallon of coating applied (PVGC), and the OC content of each cleanup material employed in pounds of OC per gallon of cleanup material used (POCGCM);

vii. For each coating, the amount of VOC emitted, in pounds per month, to be defined as " CVOC" and calculated as follows:

CVOC = CT * PVGC

viii. For each cleanup material, the amount of OC emitted, in pounds per month, to be defined as "CMOC" and calculated as follows:

CMOC = CM * POCGCM

b. The total amount of VOC emitted (TVOC) from coatings employed in this emissions unit, in tons per month, i.e., the total coating VOC (TDV), divided by 2000 pounds per ton, and represented by the following equation:

TVOC = (TDV) / (2000 lbs/ton)

where:

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from i = 1 to i = n, of (CVOC)i,

where

i = subscript denoting an individual coating; and
n = the total number of different coatings employed.

c. For each single HAP, the total amount of that HAP emitted (TSHAP) from coatings employed in this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP), divided by 2000 pounds per ton, and represented by the following equation:

TSHAP = (SHAP) / (2000 lbs/ton)

where:

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from i = 1 to i = n of (PUDH)i,

where:

(PUDH)i = total monthly emissions of a single HAP from each coating, in pounds, and is calculated by multiplying the pounds of HAP per gallon of coating, recorded in C.2.a.v, by CT.
i = subscript denoting and individual coating; and

n = the total number of different coatings employed that contain the HAP.

d. The total amount of combined HAPs emitted (TCHAP) from coatings employed in this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and is represented by the following equation:

TCHAP = the sum, from i = 1 to i = n, of (TSHAP)i,

where:

TSHAP = total monthly emissions for a single HAP from all coatings, in tons per month, calculated according to the equations in C.2.c.

i = subscript denoting each single HAP; and

n = the total number of different single HAPs.

e. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R002, R003, R004, R006 and R007.

f. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R002, R003, R004, R006 and R007.

g. The rolling 12-month summation of the combined coating usage in units R002, R003, R004 and R007.

3. The permittee shall record annually the following information for emissions unit R002:

a. the VOC emissions (tons), based on a summation of the monthly records in Section C.2.b.

b. the OC emissions (tons), based on a summation of the monthly records in Section C.2.a.

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

5. The permit to install for this emissions unit 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 (or other Ohio EPA approved 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	Ethyl Benzene	Xylene	Toluene	Ethyl Alcohol	MIBK	Acetone
TLV (ug/m3)	434	434	188	1880	205	1,780
Max.Hourly Emission Rate (lbs/hr)	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hour Max. Ground-Level Concentration (ug/m3)	222.5	2,208	805	2,137	2,313	98
MAGLC (ug/m3)	10,333	10,333	4,476	44,762	4,881	42,380

6. 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.).

7. 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.

8. 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 submit deviation (excursion) reports which include the following information:

a. An identification of each month during which the VOC content of any coating employed

exceeded 7.1 pounds VOC per gallon as applied, excluding water and exempt solvents, and the actual VOC content of each such coating employed for each such time.

b. All exceedances of the rolling, 12-month emission limitation for each single HAP.

c. All exceedances of the rolling, 12-month emission limitation for total combined HAP.

d. All exceedances of the coating usage limits specified in sections A.2.a and A.2.b of these terms and conditions.

2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.

3. The permittee shall submit annual reports which summarize the following information:

a. Emissions of VOC from this emissions unit.

b. Emissions of each single HAP from this unit and from the entire facility.

c. Emissions of total combined HAPs from this unit and from the entire facility.

d. The annual coating usage for R002, R003, R004 and R007 combined.

e. Emissions of OC from the cleanup material employed in this emissions unit.

The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

2. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event occurs.

3. The permittee shall submit an annual report summarizing the attempts to find and implement compliant coating as defined in OAC rule 3745-21-09(U)(1) during the previous year. This report shall be submitted to the Ohio EPA Northeast District Office by February 1 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be

determined in accordance with the following methods:

a. Emission Limitation:

7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:

Emissions unit, R002, shall employ no more than 10 gallons per day of coating.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.1. of these terms and conditions.

c. Emission Limitation:

Emission units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1. and C.2.g. of these terms and conditions.

d. Emission Limitation:

13.4 tons per year of VOC emissions from the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.2.a, C.2.b. and C.3. of these terms and conditions.

e. Emission Limitation:

0.48 ton per year of OC emissions from the cleanup material employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.2.a. and C.3.b. of these terms and conditions.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.90 tons per year of each single HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2.a, C.2.c and C.2.e. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

b. Emission Limitation:

24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2.d. and C.2.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. This PTI #02-14529 will replace, in whole, the Permit to Install #02-13582, issued on March 15, 2001, which replaced, in whole, the Permit to Install # 02-7458, issued on August 25, 1993.

2. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to install, excluding Air Toxics Policy, are federally enforceable: A - F.

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	Applicable Emissions Limitations/Control Measures
R003 - Automatic spray booth for the application of adhesives to metal inserts for the bonding of rubber.	OAC rule 3745-31-05(A)(3)	Compliance with the Air Toxics Policy, as specified in C.5. thru C.8. below. See A.2.a, A.2.b and A.2.d below. 13.4 tons per year of volatile organic compound emissions from coatings. 0.48 ton per year of organic compound emissions from cleanup materials.
	OAC rule 3745-21-09(U)(2)(f)	See A.2.a and A.2.b. below.
	OAC rule 3745-35-07(B)	See A.2.c. below.

2. Additional Terms and Conditions

2.a This emissions unit, R003, shall employ no more than 10 gallons per day of coating. Emissions units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

2.b The VOC content of coatings employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

The permittee shall continue to research potential "lower solvent" adhesives for implementation in this emissions unit. The above allowable VOC per gallon applies to the coating of miscellaneous metal products with adhesives exclusively.

2.c Facility wide emissions from R002, R003, R004, R006 and R007 shall not exceed the following limits:

i. 9.90 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

ii. 24.90 tons per year of total, combined HAP, based upon a rolling, 12-month summation.

2.d The permittee shall not use cleanup material which contains HAPs.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emission unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall keep the following daily records to ensure compliance with the daily, coating limitation:

a. The name and identification number of each coating employed.

b. The amount of each coating employed, in gallons per day.

c. The total amount of coatings employed in this emissions unit, in gallons per day.

d. The total combined amount of coatings employed in emissions units R002, R003 R004 and R007, in gallons per day.

2. The permittee shall keep the following monthly records to ensure compliance with the VOC, OC and HAP emission limits:

a. For each coating and cleanup material used in this emissions unit:

i. The name and identification number of each coating and cleanup material employed;

ii. The VOC content of each coating employed, in pounds VOC per gallon of coating as applied, excluding water and exempt solvents.

iii. Amount of each coating used, "CT", in gallons per month;

iv. Amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

v. Amount of each, single HAP in each coating, in pounds per gallon;

vi. VOC content of each coating applied, in pounds of VOC per gallon of coating as applied (PVGC), and the OC content of each cleanup material employed in pounds of OC per gallon of cleanup material used (POCGCM);

vii. For each coating, the amount of VOC emitted, in pounds per month, to be defined as " CVOC" and calculated as follows:

CVOC = CT * PVGC

viii. For each cleanup material, the amount of OC emitted, in pounds per month, to be defined as "CMOC" and calculated as follows:

CMOC = CM * POCGCM

b. The total amount of VOC emitted (TVOC) from coatings employed in this emissions unit, in tons per month, i.e., the total coating VOC (TDV), divided by 2000 pounds per ton, and represented by the following equation:

TVOC = (TDV) / (2000 lbs/ton)

where:

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from i = 1 to i = n, of (CVOC)i,

where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

c. For each single HAP, the total amount of that HAP emitted (TSHAP) from coatings employed in this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP), divided by 2000 pounds per ton, and represented by the following equation:

TSHAP = (SHAP) / (2000 lbs/ton)

where:

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from i = 1 to i = n of (PUDH)i,
where:

(PUDH)i = total monthly emissions of a single HAP from each coating, in pounds, and is calculated by multiplying the pounds of HAP per gallon of coating, recorded in C.2.a.v, by CT.

i = subscript denoting and individual coating; and

n = the total number of different coatings employed that contain the HAP.

d. The total amount of combined HAPs emitted (TCHAP) from coatings employed in this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and is represented by the following equation:

TCHAP = the sum, from i = 1 to i = n, of (TSHAP)i,

where:

TSHAP = total monthly emissions for a single HAP from all coatings, in tons per month, calculated according to the equations in C.2.c.

i = subscript denoting each single HAP; and

n = the total number of different single HAPs.

e. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R002, R003, R004, R006 and R007.

f. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R002, R003, R004, R006 and R007.

g. The rolling 12-month summation of the combined coating usage in units R002, R003, R004 and R007.

3. The permittee shall record annually the following information for emissions unit R003:

a. the VOC emissions (tons), based on a summation of the monthly records in Section C.2.b.

b. the OC emissions (tons), based on a summation of the monthly records in Section C.2.a.

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

5. The permit to install for this emissions unit 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 (or other Ohio EPA approved 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	Ethyl Benzene	Xylene	Toluene	Ethyl Alcohol	MIBK	Acetone
TLV (ug/m3)	434	434	188	1880	205	1,780
Max.Hourly Emission Rate (lbs/hr)	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hour Max. Ground-Level Concentration (ug/m3)	222.5	2,208	805	2,137	2,313	98
MAGLC (ug/m3)	10,333	10,333	4,476	44,762	4,881	42,380

6. 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.).

7. 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.

8. 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 submit deviation (excursion) reports which include the following information:

a. An identification of each month during which the VOC content of any coating employed exceeded 7.1 pounds VOC per gallon as applied, excluding water and exempt solvents, and the actual VOC content of each such coating employed for each such time.

b. All exceedances of the rolling, 12-month emission limitation for each single HAP.

c. All exceedances of the rolling, 12-month emission limitation for total combined HAP.

d. All exceedances of the coating usage limits specified in sections A.2.a and A.2.b of these terms and conditions.

2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General

Terms and Conditions.

3. The permittee shall submit annual reports which summarize the following information:

a. Emissions of VOC from this emissions unit.

b. Emission of each single HAP from this unit and from the entire facility.

c. Emissions of total combined HAPs from this unit and from the entire facility.

d. The annual coating usage for R002, R003, R004 and R007 combined.

e. Emissions of OC from cleanup material employed in this emissions unit.

The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

2. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event occurs.

3. The permittee shall submit an annual report summarizing the attempts to find and implement compliant coating as defined in OAC rule 3745-21-09(U)(1) during the previous year. This reports shall be submitted to the Ohio EPA Northeast District Office by February 1 of each year.

E. Testing Requirements

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

a. Emission Limitation:

7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be

used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:

Emissions unit, R003, shall employ no more than 10 gallons per day of coating.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.1. of these terms and conditions.

c. Emission Limitation:

Emission units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1. and C.2.g. of these terms and conditions.

d. Emission Limitation:

13.4 tons per year of VOC emissions from the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.2.a, C.2.b. and C.3. of these terms and conditions.

e. Emission Limitation:

0.48 ton per year of OC emissions from the cleanup material employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in C.2.a. and C.3.b. of these terms and conditions.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.90 tons per year of each single HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.a, C.2.c and C.2.e. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

b. Emission Limitation:

24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2.d. and C.2.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. This PTI #02-14529 will replace, in whole, the Permit to Install #02-13582, issued on March 15, 2001, which replaced, in whole, the Permit to Install # 02-7458, issued on August 25, 1993.

2. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to install, excluding Air Toxics Policy, are federally enforceable: A - F.

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	Applicable Emissions Limitations/Control Measures
R004 - Automatic spray booth for the application of adhesives to metal inserts for the bonding of rubber.	OAC rule 3745-31-05(A)(3)	Compliance with the Air Toxics Policy, as specified in C.5. thru C.8. below. See A.2.a, A.2.b and A.2.d. below. 13.4 tons per year of volatile organic compound emissions from coatings. 0.48 ton per year of organic compound emissions from cleanup materials.
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-35-07(B)	See A.2.a and A.2.b. below. See A.2.c. below.

2. Additional Terms and Conditions

2.a This emissions unit, R004, shall employ no more than 10 gallons per day of coating. Emissions units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

2.b The VOC content of coatings employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

The permittee shall continue to research potential "lower solvent" adhesives for implementation in this emissions unit. The above allowable VOC per gallon applies to the coating of miscellaneous metal products with adhesives exclusively.

2.c Facility wide emissions from R002, R003, R004, R006 and R007 shall not exceed the following limits:

i. 9.90 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

ii. 24.90 tons per year of total, combined HAP, based upon a rolling, 12-month summation.

2.d The permittee shall not use cleanup material which contains HAPs.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emission unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall keep the following daily records to ensure compliance with the daily, coating limitation:

a. The name and identification number of each coating employed;

b. Amount of each coating employed, in gallons per day.

c. The total amount of coatings employed in this emissions unit, in gallons per day.

d. The total combined amount of coatings employed in emissions units R002, R003, R004 and R007, in gallons per day.

2. The permittee shall keep the following monthly records to ensure compliance with the VOC, OC and HAP emission limits:

a. For each coating and cleanup material used in this emissions unit:

i. The name and identification number of each coating and cleanup material employed;

ii. The VOC content of each coating employed, in pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

iii. Amount of each coating used, "CT", in gallons per month;

iv. Amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

v. Amount of each, single HAP in each coating, in pounds per gallon;

vi. VOC content of each coating applied, in pounds of VOC per gallon of coating applied (PVGC), in pounds per gallon of coating excluding water and exempt solvents, and the OC content of each cleanup material employed in pounds of OC per gallon of cleanup material used (POCGCM);

vii. For each coating, the amount of VOC emitted, in pounds per month, to be defined as " CVOC" and calculated as follows:

CVOC = CT * PVGC

viii. For each cleanup material, the amount of OC emitted, in pounds per month, to be defined as "CMOC" and calculated as follows:

CMOC = CM * POCGCM

b. The total amount of VOC emitted (TVOC) from coatings employed in this emissions unit, in tons per month, i.e., the total coating VOC (TDV), divided by 2000 pounds per ton, and represented by the following equation:

TVOC = (TDV) / (2000 lbs/ton)

where:

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from i = 1 to i = n, of (CVOC)i,

where
i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

c. For each single HAP, the total amount of that HAP emitted (TSHAP) from coatings employed in this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP), divided by 2000 pounds per ton, and represented by the following equation:

TSHAP = (SHAP) / (2000 lbs/ton)

where:

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from i = 1 to i = n of (PUDH)i,
where:

(PUDH)i = total monthly emissions of a single HAP from each coating, in pounds, and is calculated by multiplying the pounds of HAP per gallon of coating, recorded in C.2.a.v, by CT.

i = subscript denoting and individual coating; and

n = the total number of different coatings employed that contain the HAP.

d. The total amount of combined HAPs emitted (TCHAP) from coatings employed in this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and is represented by the following equation:

TCHAP = the sum, from i = 1 to i = n, of (TSHAP)i,

where

TSHAP = total monthly emissions for a single HAP from all coatings, in tons per month, calculated according to the equations in C.2.c.

i = subscript denoting each single HAP; and

n = the total number of different single HAPs.

e. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R002, R003, R004, R006 and R007.

f. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R002, R003, R004, R006 and R007.

g. The rolling 12-month summation of the combined coating usage in units R002, R003, R004 and R007.

3. The permittee shall record annually the following information for emissions unit R004:

a. the VOC emissions (tons), based on a summation of the monthly records in Section C.2.b.

b. the OC emissions (tons), based on a summation of the monthly records in Section C.2.a.

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

5. The permit to install for this emissions unit 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 (or other Ohio EPA approved 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	Ethyl Benzene	Xylene	Toluene	Ethyl Alcohol	MIBK	Acetone
TLV (ug/m3)	434	434	188	1880	205	1,780
Max.Hourly Emission Rate (lbs/hr)	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hour Max. Ground-Level Concentration (ug/m3)	222.5	2,208	805	2,137	2,313	98
MAGLC (ug/m3)	10,333	10,333	4,476	44,762	4,881	42,380

6. 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.).

7. 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.

8. 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 submit deviation (excursion) reports which include the following information:

a. An identification of each month during which the VOC content of any coating employed exceeded 7.1 pounds VOC per gallon as applied, excluding water and exempt solvents, and the actual VOC content of each such coating employed for each such time.

b. All exceedances of the rolling, 12-month emission limitation for each single HAP.

c. All exceedances of the rolling, 12-month emission limitation for total combined HAP.

d. All exceedances of the coating usage limits specified in sections A.2.a and A.2.b of these terms and conditions.

2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General

Terms and Conditions.

3. The permittee shall submit annual reports which summarize the following information:

   a. Emissions of VOC from this emissions unit.

   b. Emissions of each single HAP from this unit and from the entire facility.

   c. Emissions of total combined HAPs from this unit and from the entire facility.

   d. The annual coating usage for R002, R003, R004 and R007 combined.

   e. Emissions of OC from cleanup material employed in emissions unit.

   The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event occurs.

5. Ashtabula Rubber shall submit an annual report summarizing the attempts to find and implement compliant coating as defined in OAC rule 3745-21-09(U)(1) during the previous year. This reports shall be submitted to the Ohio EPA Northeast District Office by February 1 of each year.

E. Testing Requirements

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

   a. Emission Limitation:

      7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

      Applicable Compliance Method:

      In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA

and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:

Emissions unit, R004, shall employ no more than 10 gallons per day of coating.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.1. of these terms and conditions.

c. Emission Limitation:

Emission units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1. and C.2.g. of these terms and conditions.

d. Emission Limitation:

13.4 tons per year of VOC emissions from the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.2.a, C.2.b. and C.3. of these terms and conditions.

e. Emission Limitation:

0.48 ton per year of OC emissions from the cleanup material employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in C.2.a. and C.3.b. of these

terms and conditions.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      9.90 tons per year of each single HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

      Applicable Compliance Method:

      Compliance shall be based upon the recordkeeping specified in Sections C.2.a, C.2.c and C.2.e. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

   b. Emission Limitation:

      24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2.d. and C.2.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. This PTI #02-14529 will replace, in whole, the Permit to Install #02-13582, issued on March 15, 2001, which replaced, in whole, the Permit to Install # 02-7458, issued on August 25, 1993.

2. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to install, excluding Air Toxics Policy, are federally enforceable: A - F.

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	Applicable Emissions Limitations/Control Measures
R006 - Manual spray booth for the application of adhesives to metal inserts for the bonding of rubber.	OAC rule 3745-31-05(A)(3)	Compliance with the Air Toxics Policy, as specified in C.5. thru C.8. below. See A.2.a. and A.2.c. below. 4.37 tons per year of volatile organic compounds.
	OAC rule 3745-21-09(U)(2)(e)(ii)	0.48 ton per year of organic compound emissions from cleanup material.
	OAC rule 3745-35-07(B)	Same as the limit established by OAC rule 3745-31-05(A)(3) stated in A.2.a. below. See A.2.b. below.

2. Additional Terms and Conditions

2.a This emissions unit, R006, shall not employ more than 3 gallons of coating per day.

2.b Facility wide emissions from R002, R003, R004, R006 and R007 shall not exceed the following limits:

i. 9.90 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

ii. 24.90 tons per year of total, combined HAP, based upon a rolling, 12-month summation.

2.c The permittee shall not use cleanup material which contains HAPs.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emission unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall keep the following daily records to ensure compliance with the daily, coating limitation:

   a. The name and identification number of each coating employed.

   b. The amount of each coating used, in gallons per day.

   c. The total amount of coatings employed in this emissions unit, in gallons per day.

2. The permittee shall keep the following monthly records to ensure compliance with the VOC and HAP emission limits:

   a. For each coating and cleanup material used in this emissions unit:

      i. The name and identification number of each coating and cleanup material employed;

      ii. Amount of each coating used, "CT", in gallons per month;

      iii. Amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

      iv. Amount of each, single HAP in each coating, in pounds per gallon;

      v. VOC content of each coating applied, in pounds of VOC per gallon of coating

applied (PVGC), in pounds per gallon of coating excluding water and exempt solvents, and the OC content of each cleanup material in pounds of OC per gallon of cleanup material used (POCGCM);

vi. For each coating, the amount of VOC emitted, in pounds per month, to be defined as " CVOC" and calculated as follows:

CVOC = CT * PVGC

vii. For each cleanup material, the amount of OC emitted, in pounds per month, to be defined as "CMOC" and calculated as follows:

CMOC = CM * POCGCM

b. The total amount of VOC emitted (TVOC) from coatings employed in this emissions unit, in tons per month, i.e., the total coating VOC (TDV), divided by 2000 pounds per ton, and represented by the following equation:

TVOC = (TDV) / (2000 lbs/ton)

where:

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from i = 1 to i = n, of (CVOC)i,

where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

c. For each single HAP, the total amount of that HAP emitted (TSHAP) from coatings employed in this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP), divided by 2000 pounds per ton, and represented by the following equation:

TSHAP = (SHAP) / (2000 lbs/ton)

where:

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from i = 1 to i = n of (PUDH)i,

where

(PUDH)i = total monthly emissions of a single HAP from each coating, in pounds, and is calculated by multiplying the pounds of HAP per gallon of coating, recorded in C.2.a.iv, by CT.

i = subscript denoting and individual coating; and

n = the total number of different coatings employed that contain the HAP.

d. The total amount of combined HAPs emitted (TCHAP) from coatings employed in this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and is represented by the following equation:

TCHAP = the sum, from i = 1 to i = n, of (TSHAP)i,

where

TSHAP = total monthly emissions for a single HAP from all coatings, in tons per month, calculated according to the equations in C.1.c.

i = subscript denoting each single HAP; and

n = the total number of different single HAPs.

e. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R002, R003, R004, R006 and R007.

f. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R002, R003, R004, R006 and R007.

3. The permittee shall record annually the following information for emissions unit R006:

a. the VOC emissions (tons), based on a summation of the monthly records in Section C.2.b.

b. the OC emissions (tons), based on a summation of the monthly records in section C.2.a. and C.3.b.

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

5. The permit to install for this emissions unit 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 (or other Ohio EPA approved 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	Ethyl Benzene	Xylene	Toluene	Ethyl Alcohol	MIBK	Acetone
TLV (ug/m3)	434	434	188	1880	205	1,780
Max.Hourly Emission Rate (lbs/hr)	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hour Max. Ground-Level Concentration (ug/m3)	222.5	2,208	805	2,137	2,313	98
MAGLC (ug/m3)	10,333	10,333	4,476	44,762	4,881	42,380

6. 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.).

7. 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.

8. 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 submit deviation (excursion) reports which include the following information:

   a. All exceedances of the rolling, 12-month emission limitation for each single HAP.

   b. All exceedances of the rolling, 12-month emission limitation for total combined HAP.

   c. All exceedances of the daily coating usage limitation specified in A.2.a. and A.2.b of these terms and conditions.

2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.

3. The permittee shall submit annual reports which summarize the following information:

   a. Emissions of VOC from this emissions unit.

   b. Emissions of each single HAP from this unit and from the entire facility.

   c. Emissions of total combined HAPs from this unit and from the entire facility.

   d. Emissions of OC from cleanup material employed in this emissions unit.

   The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event occurs.

E. Testing Requirements

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

   a. Emission Limitation:

      4.37 tons per year of VOC emissions

      Compliance determination:

      Compliance shall be based upon the record keeping specified in C.2.a, C.2.b. and C.3. of these terms and conditions.

   b. Emission Limitation:

      0.48 ton per year of OC emissions from the cleanup material employed in this emissions unit.

      Applicable Compliance Method:

      Compliance shall be based upon the recordkeeping specified in C.2.a. and C.3.b. of these terms and conditions.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Usage Limitation:

      This emissions unit shall not employ more than 3 gallons of coating per day.

      Compliance determination:

      Compliance with this usage limitation shall be based upon the record keeping in C.1. of these terms and conditions.

   b. Emission Limitation:

      9.90 tons per year of each single HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.a, C.2.c and C.2.e. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

c. Emission Limitation:

24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2.d. and C.2.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. This PTI #02-14529 will replace, in whole, the Permit to Install #02-13582, issued on March 15, 2001, which replaced, in whole, the Permit to Install # 02-7458, issued on August 25, 1993.

2. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to install, excluding Air Toxics Policy, are federally enforceable: A - F.

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	Applicable Emissions Limitations/Control Measures
R007 - Paashe, automatic spray booth for coating metal parts with adhesives for the bonding of rubber parts.	OAC rule 3745-31-05(A)(3)	Compliance with the Air Toxics Policy, as specified in C.5. thru C.8. below. See A.2.a, A.2.b and A.2.d. below. 13.4 tons per year of volatile organic compound emissions from coatings. 0.48 ton per year of organic compound emissions from cleanup materials.
	OAC rule 3745-21-09(U)(2)(f)	See A.2.a and A.2.b. below.
	OAC rule 3745-35-07(B)	See A.2.c. below.

2. Additional Terms and Conditions

2.a This emissions unit, R007, shall employ no more than 10 gallons per day of coating. Emissions units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

2.b The VOC content of coatings employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

Emissions Unit ID: **R007**

The permittee shall continue to research potential "lower solvent" adhesives for implementation in this emissions unit. The above allowable VOC per gallon applies to the coating of miscellaneous metal products with adhesives exclusively.

2.c Facility wide emissions from R002, R003, R004, R006 and R007 shall not exceed the following limits:

i. 9.90 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

ii. 24.90 tons per year of total, combined HAPs, based upon a rolling, 12-month summation.

2.d The permittee shall not use cleanup material which contains HAPs.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emission unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep the following daily records to ensure compliance with the daily, coating limitation:

a. The name and identification number of each coating employed.

b. The amount of each coating employed, in gallons per day.

c. The total amount of coatings employed in this emissions unit, in gallons per day.

d. The total combined amount of coatings employed in emissions units R002, R003, R004 and R007, in gallons per day.

2. The permittee shall keep the following monthly records to ensure compliance with the VOC, OC and HAP emission limits:

a. For each coating and cleanup material used in this emissions unit:

i. The name and identification number of each coating and cleanup material employed;

ii. The VOC content of each coating employed, in pounds of VOC per gallon of coating as applied, excluding water and exempt solvents;

iii. The amount of each coating used, "CT", in gallons per month;

iv. The amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

v. The amount of each, single HAP in each coating and clean up material, in pounds per gallon;

vi. VOC content of each coating applied, in pounds of VOC per gallon of coating applied (PVGC), and the OC content of each cleanup material employed in pounds of OC per gallon of cleanup material used (POCGCM);

vii. For each coating, the amount of VOC emitted, in pounds per month, to be defined as " CVOC" and calculated as follows:

CVOC = CT * PVGC

viii. For each cleanup material, the amount of OC emitted, in pounds per month, to be defined as "CMOC" and calculated as follows:

CMOC = CM * POCGCM

b. The total amount of VOC emitted (TVOC) from coatings employed in this emissions unit, in tons per month, i.e., the total coating VOC (TDV), divided by 2000 pounds per ton, and represented by the following equation:

TVOC = (TDV) / (2000 lbs/ton)

where:

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from i = 1 to i = n, of (CVOC)i,

where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

c. For each single HAP, the total amount of that HAP emitted (TSHAP) from coatings employed in this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP), divided by 2000 pounds per ton, and represented by the following equation:

TSHAP = (SHAP) / (2000 lbs/ton)

where:

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from i = 1 to i = n of (PUDH)i,

where:

(PUDH)i = total monthly emissions of a single HAP from each coating, in pounds, and is calculated by multiplying the pounds of HAP per gallon of coating, recorded in C.2.a.v, by CT.

i = subscript denoting and individual coating; and

n = the total number of different coatings employed that contain the HAP.

d. The total amount of combined HAPs emitted (TCHAP) from coatings employed in this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and is represented by the following equation:

TCHAP = the sum, from i = 1 to i = n, of (TSHAP)i,

where:

TSHAP = total monthly emissions for a single HAP from all coatings, in tons per month, calculated according to the equations in C.2.c.

i = subscript denoting each single HAP; and

n = the total number of different single HAPs.

e. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R002, R003, R004, R006 and R007.

f. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R002, R003, R004, R006 and R007.

g. The rolling 12-month summation of the combined coating usage in units R002, R003, R004 and R007.

3. The permittee shall record annually the following information for emissions unit R007:

a. the VOC emissions (tons), based on a summation of the monthly records in Section C.2.b.
b. the OC emissions (tons), based on a summation of the monthly records in Section C.2.a.

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

5. The permit to install for this emissions unit 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 (or other Ohio EPA approved 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	Ethyl Benzene	Xylene	Toluene	Ethyl Alcohol	MIBK	Acetone
TLV (ug/m3)	434	434	188	1880	205	1,780
Max.Hourly Emission Rate (lbs/hr)	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hour Max. Ground-Level Concentration (ug/m3)	222.5	2,208	805	2,137	2,313	98
MAGLC (ug/m3)	10,333	10,333	4,476	44,762	4,881	42,380

6. 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.).

7. 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.

8. 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 submit deviation (excursion) reports which include the following information:

a. An identification of each month during which the VOC content of any coating employed exceeded 7.1 pounds VOC per gallon as applied, excluding water and exempt solvents, and the actual VOC content of each such coating employed for each such time.

b. All exceedances of the rolling, 12-month emission limitation for each single HAP.

c. All exceedances of the rolling, 12-month emission limitation for total combined HAP.

d. All exceedances of the coating usage limits specified in sections A.2.a and A.2.b of these terms and conditions.

2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.

3. The permittee shall submit annual reports which summarize the following information:

a. Emissions of VOC from this emissions unit.

b. Emissions of each single HAP from this unit and from the entire facility.

c. Emissions of total combined HAPs from this unit and from the entire facility.

d. The annual coating usage for R002, R003, R004 and R007 combined.

e. Emissions of OC from the cleanup material employed in this emissions unit.

The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

2. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event occurs.

3. The permittee shall submit an annual report summarizing the attempts to find and implement compliant coating as defined in OAC rule 3745-21-09(U)(1) during the previous year. This report shall be submitted to the Ohio EPA Northeast District Office by February 1 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be

determined in accordance with the following methods:

a. Emission Limitation:

7.1 pounds of VOC per gallon of coating as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:

Emissions unit, R007, shall employ no more than 10 gallons per day of coating.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.1. of these terms and conditions.

c. Emission Limitation:

Emission units R002, R003, R004 and R007 combined shall employ no more than 18 gallons per day of coating and 6570 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1. and C.2.g. of these terms and conditions.

d. Emission Limitation:

13.4 tons per year of VOC emissions from the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in C.2.a, C.2.b. and C.3. of these terms and conditions.

e. Emission Limitation:

0.48 ton per year of OC emissions from the cleanup material employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in C.2.a. and C.3.b. of these terms and conditions.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.90 tons per year of each single HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.a, C.2.c and C.2.e. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

b. Emission Limitation:

24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for R002, R003, R004, R006 and R007.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2.d. and C.2.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. This PTI #02-14529 will replace, in whole, the Permit to Install #02-13582, issued on March 15, 2001, which replaced, in whole, the Permit to Install # 02-7458, issued on August 25, 1993.

2. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to install, excluding Air Toxics Policy, are federally enforceable: A - F.