Facility ID: 0247070873 Issuance type: Draft State Permit To Operate

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

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

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

Go to Part II for Emissions Unit K001
Go to Part II for Emissions Unit K002
Go to Part II for Emissions Unit K003
Go to Part II for Emissions Unit K004

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Facility ID: 0247070873 Emissions Unit ID: K001 Issuance type: Draft State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
painting line for steel fan parts (Binks spray booth, spray gun, brush, and roller)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average.
	OAC rule 3745-17-11(B)(1)	Particulate emissions from this emissions unit shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	Coating usage shall not exceed 3 gallons per day.
	OAC rule 3745-35-07(B)	See Sections A.2.a, A.2.b, A.2.c, and B.3.

2. **Additional Terms and Conditions**

   (a) The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.
   The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.
   Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

B. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

2. The maximum daily coating usage for this emissions unit (K001) shall not exceed 3 gallons.

3. Coating and cleanup material usage shall not exceed 1000 gallons per year, based upon a rolling, 12-month summation of coating and cleanup material usage. During the first twelve (12) calendar months of operation following the effective date of this federally enforceable state operating permit, the cumulative number of gallons shall not exceed the cumulative total number of gallons as specified for each month in the following table:

   Month: Cumulative Number of Gallons:
   1 83.3
   2 166.7
   3 250
   4 333.3
   5 416.7
   6 500
   7 583.3
   8 666.7
   9 750
   10 833.3
   11 916.7
   12 1000

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month:

a. For this emissions unit (K001):

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

ii. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating and cleanup material employed;

iii. the volume, in gallons, of each coating and cleanup material employed; and

iv. the VOC emissions, in pounds per month [summation of (C.1.a.ii x C.1.a.iii) for all coating and cleanup materials].

b. For reinforced plastic lay-up operations (emissions units K002 and K003) and chop spray gun operations (emissions unit K004):

i. the total VOC emissions.

c. The total combined VOC emissions for all emissions units [summation of C.1.a.iv for all VOCs emitted by coating and cleanup materials for this emissions unit (K001) and C.1.b.i for all VOC emissions from reinforced plastic lay-up operations and chop spray gun operations (emissions units K002, K003, and K004)] per rolling, 12-month period.

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

3. The permittee shall collect and record the following information each month:

a. For this emissions unit (K001):

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

ii. the volume, in gallons, of each coating and cleanup material, as applied;

iii. the cumulative total volume of coating and cleanup materials employed, in gallons, during the past 12 rolling months;

iv. the individual HAP content for each HAP in each coating and cleanup material, as applied, in pounds per gallon;

v. the combined HAP contents for each HAP in each coating and cleanup material, as applied, in pounds per gallon;

vi. the total HAP emissions for this emissions unit of each single HAP [summation of (C.3.a.iii x C.3.a.iv) for all coatings and cleanup materials]; and

vii. the total combined HAP emissions for this emissions unit [summation of (C.3.a.iii x C.3.a.v) for all HAPs.

b. For reinforced plastic lay-up operations (emissions units K002 and K003) and chop spray gun operations (emissions unit K004):

i. the total HAP emissions.

c. The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of C.3.a.vi and C.3.a.vii for all HAPs emitted by coating and cleanup materials for emissions unit K001 (single HAP and combined HAPs, respectively), and C.3.b.i for all HAP emissions from reinforced plastic lay-up operations and chop spray gun operations (emissions units K002, K003, and K004)] per rolling, 12-month period.

D. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily coating usage limit (3 gallons per day). The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.

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

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.6 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each such month.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 12.6 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of VOCs from all emissions units at the facility exceeded 12.1 tons per year, and the actual rolling, 12-month emissions of VOCs for each such month.

6. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month coating and cleanup material usage for this emissions unit exceeded 1000 gallons per year, and the actual rolling, 12-month coating and cleanup material usage for each such month.

7. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General

Terms and Conditions.

8. The permittee shall submit annual reports that summarize the facility-wide emissions of each single HAP, combined HAPs, and VOCs from all emissions units at the facility. The reports shall include emission calculations, be submitted by January 31 of each year, and cover the previous calendar 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:

Visible particulate emissions from any stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1), using the procedures specified in US EPA Reference Method 9.

b. Emission Limitation:

Particulate emissions from this emissions unit shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing emission tests in accordance with US EPA Methods 1-5.

c. Emission Limitation:

Coating usage shall not exceed 3 gallons per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.1.
d. Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of HAP emissions for each single HAP.

e. Emission Limitation:

The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of combined HAP emissions.

f. Emission Limitation:

Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.1 and maintenance of a rolling, 12-month summation of VOC emissions.

2. US EPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. **Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable.

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Facility ID: 0247070873 Emissions Unit ID: K002 Issuance type: Draft State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
reinforced plastic lay-up and fabrication (impeller lay-up department in building #2)	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day, including emissions from cleanup materials. See Sections A.2.a and A.2.b.
	OAC rule 3745-35-07(B)	See Sections A.2.c, A.2.d, A.2.e, and B.1.

2. **Additional Terms and Conditions**

(a) The emissions of organic material from the reinforced plastic lay-up and fabrication operation consist of styrene, a photochemically reactive material and a hazardous air pollutant (HAP).
The emissions of organic material from cleanup activities associated with the reinforced plastic lay-up and fabrication operation consist of acetone and toluene employed in a mixture. Toluene is a photochemically reactive material and a hazardous air pollutant (HAP).
The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.
The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.
Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

B. **Operational Restrictions**

1. Lay-up material (resin) usage shall not exceed 70,000 pounds per year, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this federally enforceable state operating permit, the cumulative number of pounds shall not exceed the cumulative total number of pounds as specified for each month in the following table:

Month: Cumulative Number of Pounds:
1 5833.3
2 11,666.6
3 17,500
4 23,333.3
5 29,166.6
6 35,000
7 40,833.3
8 46,666.6
9 52,500
10 58,333.3
11 64,166.6
12 70,000

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for this emissions unit (K002):

a. the company identification for each lay-up material (resin) and each cleanup material employed;

b. the number of pounds of each lay-up material (resin) employed;

c. the styrene content of each lay-up material (resin), in percent by weight;

d. the number of gallons of each cleanup material employed;

e. the OC content of each cleanup material, in pounds per gallon;

f. the total OC emission rate for all lay-up materials (resins) and cleanup materials employed, determined in accordance with Section E.1.a of these terms and conditions, in pounds per day;

g. the actual number of hours the emissions unit was in operation; and

h. the average hourly OC emission rate for all lay-up materials (resins) and cleanup materials employed, determined in accordance with Section E.1.b of these terms and conditions, in pounds per hour.

2. The permittee shall collect and record the following information for each month:

a. For this emissions unit (K002):

i. the company identification for each lay-up material (resin) and cleanup material employed;

ii. the number of pounds of each lay-up material (resin) employed;

iii. the styrene content of each lay-up material (resin), in percent by weight;

iv. the number of gallons of each cleanup material employed;

v. the VOC (toluene) content of each cleanup material, in pounds per gallon; and

vi. the total VOC emission rate for all lay-up materials (resins), determined in accordance with Section E.1.a of these terms and conditions, and cleanup materials [summation of (C.2.a.iv x C.2.a.v) for all cleanup up materials] employed, in pounds per month.

b. For painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K003), and chop spray gun operations (emissions unit K004):

i. the total VOC emissions.

c. The total combined VOC emissions for all emissions units [summation of C.2.a.vi for all VOCs emitted by lay-up materials (resins) and cleanup materials for this emissions unit (K002) and C.2.b.i for all VOC emissions from painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K003) , and chop spray gun operations (emissions unit K004)] per rolling, 12-month period.

3. The permittee shall collect and record the following information for each month:

a. For this emissions unit (K002):

i. the individual HAP (styrene) emission rate for all lay-up materials (resins) employed, determined in accordance with Sections C.2.a and E.1.a of these terms and conditions, in pounds per month;

ii. the individual HAP (toluene) emission rate for all cleanup materials employed [summation of (C.2.a.iv x C.2.a.v) for all cleanup up materials] employed, in pounds per month; and

iii. the total combined HAP emissions for this emissions unit [summation of (C.3.a.i + C.3.a.ii) for all HAPs emitted from all lay-up materials (resins) and cleanup materials] employed, in pounds per month.
b. For painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K003), and chop spray gun operations (emissions unit K004):

i. the total HAP emissions.

c. The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of C.3.a.iii for all HAPs emitted by all lay-up materials (resins) and cleanup materials for emissions unit K002, and C.3.b.i for all HAP emissions from painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K003), and chop spray gun operations (emissions unit K004)] per rolling, 12-month period.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.6 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 12.6 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of VOCs from all emissions units at the facility exceeded 12.1 tons per year, and the actual rolling, 12-month emissions of VOCs for each such month.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month lay-up material (resin) usage for this emissions unit exceeded 70,000 pounds per year, and the actual rolling, 12-month lay-up material (resin) usage for each such month.

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

7. The permittee shall submit annual reports that summarize the facility-wide emissions of each single HAP, combined HAPs, and VOCs from all emissions units at the facility. The reports shall include emission calculations, be submitted by January 31 of each year, and cover the previous calendar 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:
Emission Limitations:

Organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day, including emissions from cleanup materials.

Applicable Compliance Method:

i. To calculate daily OC emissions from the reinforced plastic lay-up and fabrication operation with manual resin application, the permittee shall employ the following formula:

E(lay-up) = summation of (Wi x EFi)

Where

E(lay-up) = the daily OC emissions from all lay-up materials (resins), in pounds per day;

i = subscript denoting a specific lay-up material (resin) employed;

Wi = the weight of lay-up material (resin) "i" employed, in tons per day (pounds per day divided by 2000 pounds per ton); and

EFi = the emission factor for styrene emissions*, in pounds per ton, from lay-up material (resin) "i".

*This emissions factor is based on the styrene content of the resin and the application type (manual), determined as calculated or written in Table 1, titled "Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams", from 40 CFR Part 63, Subpart WWWW (included for this permit as Attachment A, Unified Emission Factors for Open Molding of Composites).
ii. To calculate daily OC emissions from cleanup materials associated with the reinforced plastic lay-up and fabrication operation, the permittee shall employ the following formula:

E(cleanup) = C.1.d x C.1.e

Where

E(cleanup) = the daily OC emissions from all cleanup materials, in pounds per day;

C.1.d = the number of gallons of each cleanup material employed per day from Section C.1.d of these terms and conditions; and

C.1.e = the OC content of each cleanup material from Section C.1.e of these terms and conditions, in pounds per gallon.
iii. To calculate total emissions from all reinforced plastic lay-up and fabrication operations with manual application of resin/glass for molded flat sheet lay-up and all cleanup materials associated with reinforced plastic lay-up and fabrication operation, the permittee shall employ the following formula:

E(total) = E(lay-up) + E(cleanup)

Where

E(total) = the daily total OC emissions from all reinforced plastic lay-up and fabrication operations and all cleanup materials, in pounds per day;

E(lay-up) = the daily OC emissions from all lay-up materials (resins) from Section E.1.a.i of these terms and conditions, in pounds per day; and

E(cleanup) = the daily OC emissions from all cleanup materials from Section E.1.a.ii of these terms and conditions, in pounds per day.

iv. The hourly OC emission limitation rate shall be determined by dividing the daily OC emission rate in Section C.1.f by the actual number of hours the emissions unit was in operation (Section C.1.g).
Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of HAP emissions for each single HAP.
Emission Limitation:

The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of combined HAP emissions.
Emission Limitation:

Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.2 and maintenance of a rolling, 12-month summation of VOC emissions.

2. US EPA Method 24 or formulation data shall be used to determine the VOC contents of the materials employed in this emissions unit. Formulation data shall be used to determine the HAP contents of the materials employed in this emissions unit.

F. **Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable.

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

Facility ID: 0247070873 Emissions Unit ID: K003 Issuance type: Draft State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
reinforced plastic lay-up and fabrication (impeller lay-up department in building #3)	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day, including emissions from cleanup materials. See Sections A.2.a and A.2.b.
	OAC rule 3745-35-07(B)	See Sections A.2.c, A.2.d, A.2.e, and B.1.

2. **Additional Terms and Conditions**

(a) The emissions of organic material from the reinforced plastic lay-up and fabrication operation consist of styrene, a photochemically reactive material and a hazardous air pollutant (HAP).
The emissions of organic material from cleanup activities associated with the reinforced plastic lay-up and fabrication operation consist of acetone and toluene employed in a mixture. Toluene is a photochemically reactive material and a hazardous air pollutant (HAP).
The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.
The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.
Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

B. **Operational Restrictions**

1. Lay-up material (resin) usage shall not exceed 70,000 pounds per year, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this federally enforceable state operating permit, the cumulative number of pounds shall not exceed the cumulative total number of pounds as specified for each month in the following table:

Month: Cumulative Number of Pounds:
1 5833.3
2 11,666.6
3 17,500
4 23,333.3
5 29,166.6
6 35,000
7 40,833.3
8 46,666.6
9 52,500
10 58,333.3
11 64,166.6
12 70,000

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for this emissions unit (K003):

a. the company identification for each lay-up material (resin) and each cleanup material employed;

b. the number of pounds of each lay-up material (resin) employed;

c. the styrene content of each lay-up material (resin), in percent by weight;

d. the number of gallons of each cleanup material employed;

e. the OC content of each cleanup material, in pounds per gallon;

f. the total OC emission rate for all lay-up materials (resins) and cleanup materials employed, determined in accordance with Section E.1.a of these terms and conditions, in pounds per day;

g. the actual number of hours the emissions unit was in operation; and

h. the average hourly OC emission rate for all lay-up materials (resins) and cleanup materials employed, determined in accordance with Section E.1.b of these terms and conditions, in pounds per hour.

2. The permittee shall collect and record the following information for each month:

a. For this emissions unit (K003):

i. the company identification for each lay-up material (resin) and cleanup material employed;

ii. the number of pounds of each lay-up material (resin) employed;

iii. the styrene content of each lay-up material (resin), in percent by weight;

iv. the number of gallons of each cleanup material employed;

v. the VOC (toluene) content of each cleanup material, in pounds per gallon; and

vi. the total VOC emission rate for all lay-up materials (resins), determined in accordance with Section E.1.a of these terms and conditions, and cleanup materials [summation of (C.2.a.iv x C.2.a.v) for all cleanup up materials] employed, in pounds per month.

b. For painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K002), and chop spray gun operations (emissions unit K004):

i. the total VOC emissions.

c. The total combined VOC emissions for all emissions units [summation of C.2.a.vi for all VOCs emitted by lay-up materials (resins) and cleanup materials for this emissions unit (K002) and C.2.b.i for all VOC emissions from painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K003) , and chop spray gun operations (emissions unit K004)] per rolling, 12-month period.

3. The permittee shall collect and record the following information for each month:

a. For this emissions unit (K003):

i. the individual HAP (styrene) emission rate for all lay-up materials (resins) employed, determined in accordance with Sections C.2.a and E.1.a of these terms and conditions, in pounds per month;

ii. the individual HAP (toluene) emission rate for all cleanup materials employed [summation of (C.2.a.iv x C.2.a.v) for all cleanup up materials] employed, in pounds per month; and

iii. the total combined HAP emissions for this emissions unit [summation of (C.3.a.i + C.3.a.ii) for all HAPs emitted from all lay-up materials (resins) and cleanup materials] employed, in pounds per month.
b. For painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K002), and chop spray gun operations (emissions unit K004):

i. the total HAP emissions.

c. The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of C.3.a.iii for all HAPs emitted by all lay-up materials (resins) and cleanup materials for emissions unit K003, and C.3.b.i for all HAP emissions from painting operations (emissions unit K001), reinforced plastic lay-up operations (emissions unit K002), and chop spray gun operations (emissions unit K004)] per rolling, 12-month period.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.6 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 12.6 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of VOCs from all emissions units at the facility exceeded 12.1 tons per year, and the actual rolling, 12-month emissions of VOCs for each such month.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling,

12-month lay-up material (resin) usage for this emissions unit exceeded 70,000 pounds per year, and the actual rolling, 12-month lay-up material (resin) usage for each such month.

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

7. The permittee shall submit annual reports that summarize the facility-wide emissions of each single HAP, combined HAPs, and VOCs from all emissions units at the facility. The reports shall include emission calculations, be submitted by January 31 of each year, and cover the previous calendar 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:
Emission Limitations:

Organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day, including emissions from cleanup materials.

Applicable Compliance Method:

i. To calculate daily OC emissions from the reinforced plastic lay-up and fabrication operation with manual resin application, the permittee shall employ the following formula:

E(lay-up) = summation of (Wi x EFi)

Where

E(lay-up) = the daily OC emissions from all lay-up materials (resins), in pounds per day;

i = subscript denoting a specific lay-up material (resin) employed;

Wi = the weight of lay-up material (resin) "i" employed, in tons per day (pounds per day divided by 2000 pounds per ton); and

EFi = the emission factor for styrene emissions*, in pounds per ton, from lay-up material (resin) "i".

*This emissions factor is based on the styrene content of the resin and the application type (manual), determined as calculated or written in Table 1, titled "Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams", from 40 CFR Part 63, Subpart WWWW (included for this permit as Attachment A, Unified Emission Factors for Open Molding of Composites).
ii. To calculate daily OC emissions from cleanup materials associated with the reinforced plastic lay-up and fabrication operation, the permittee shall employ the following formula:

E(cleanup) = C.1.d x C.1.e

Where

E(cleanup) = the daily OC emissions from all cleanup materials, in pounds per day;

C.1.d = the number of gallons of each cleanup material employed per day from Section C.1.d of these terms and conditions; and

C.1.e = the OC content of each cleanup material from Section C.1.e of these terms and conditions, in pounds per gallon.
iii. To calculate total emissions from all reinforced plastic lay-up and fabrication operations with manual application of resin/glass for molded flat sheet lay-up and all cleanup materials associated with reinforced plastic lay-up and fabrication operation, the permittee shall employ the following formula:

E(total) = E(lay-up) + E(cleanup)

Where

E(total) = the daily total OC emissions from all reinforced plastic lay-up and fabrication operations and all cleanup materials, in pounds per day;

E(lay-up) = the daily OC emissions from all lay-up materials (resins) from Section E.1.a.i of these terms and conditions, in pounds per day; and

E(cleanup) = the daily OC emissions from all cleanup materials from Section E.1.a.ii of these terms and conditions, in pounds per day.

iv. The hourly OC emission limitation rate shall be determined by dividing the daily OC emission rate in Section C.1.f by the actual number of hours the emissions unit was in operation (Section C.1.g).
Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of HAP emissions for each single HAP.
Emission Limitation:

The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of combined HAP emissions.
Emission Limitation:

Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.2 and maintenance of a rolling, 12-month summation of VOC emissions.

2. US EPA Method 24 or formulation data shall be used to determine the VOC contents of the materials employed in this emissions unit. Formulation data shall be used to determine the HAP contents of the materials employed in this emissions unit.

F. **Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable.

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

Facility ID: 0247070873 Emissions Unit ID: K004 Issuance type: Draft State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

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

(a) None.

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

(a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
chop spray gun operation with non-atomized chop spray of resin/glass for molded and flat sheet lay-up	OAC rule 3745-31-05(A)(3) (PTI 02-20369)	Organic compound (OC) emissions shall not exceed 2.051 lbs/hr, including emissions from cleanup materials. Organic compound (OC) emissions shall not exceed 7.3 tons per year, including emissions from cleanup materials. See Sections A.2.a and A.2.b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 40 lbs/day, including emissions from cleanup materials. See Sections A.2.a and A.2.b. The hourly emission limitation specified in OAC rule 3745-21-07(G)(2) is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B)	See Sections A.2.c, A.2.d, A.2.e, and B.1.

2. **Additional Terms and Conditions**

(a) The emissions of organic material from the chop spray gun operation consist of styrene, a photochemically reactive material and a hazardous air pollutant (HAP).
The emissions of organic material from cleanup activities associated with the chop spray gun operation consist of acetone and toluene employed in a mixture. Toluene is a photochemically reactive material

and a hazardous air pollutant (HAP).

The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.

The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.

Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 combined shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

B. **Operational Restrictions**

1. Lay-up material (resin) usage shall not exceed 150,000 pounds per year, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this federally enforceable state operating permit, the cumulative number of pounds shall not exceed the cumulative total number of pounds as specified for each month in the following table:

Month: Cumulative Number of Pounds:
1 12,500
2 25,000
3 37,500
4 50,000
5 62,500
6 75,000
7 87,500
8 100,000
9 112,500
10 125,000
11 137,500
12 150,000

C. **Monitoring and/or Record Keeping Requirements**

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

a. the company identification for each lay-up material (resin) and each cleanup material employed;

b. the number of pounds of each lay-up material (resin) employed;

c. the styrene content of each lay-up material (resin), in percent by weight;

d. the number of gallons of each cleanup material employed;

e. the OC content of each cleanup material, in pounds per gallon;

f. the total OC emission rate for all lay-up materials (resins) and cleanup materials employed, determined in accordance with Section E.1.a of these terms and conditions, in pounds per day;

g. the actual number of hours the emissions unit was in operation; and

h. the average hourly OC emission rate for all lay-up materials (resins) and cleanup materials employed, determined in accordance with Section E.1.b of these terms and conditions, in pounds per hour.

2. The permittee shall collect and record the following information for each month:

a. For this emissions unit (K004):

i. the company identification for each lay-up material (resin) and cleanup material employed;

ii. the number of pounds of each lay-up material (resin) employed;

iii. the styrene content of each lay-up material (resin), in percent by weight;

iv. the number of gallons of each cleanup material employed;

v. the VOC (toluene) content of each cleanup material, in pounds per gallon; and

vi. the total VOC emission rate for all lay-up materials (resins), determined in accordance with Section E.1.a of these terms and conditions, and cleanup materials [summation of (C.2.a.iv x C.2.a.v) for all cleanup up materials] employed, in pounds per month.

b. For painting operations (emissions unit K001) and reinforced plastic lay-up operations (emissions units K002 and K003):

i. the total VOC emissions.

c. The total combined VOC emissions for all emissions units [summation of C.2.a.vi for all VOCs emitted by lay-up materials (resins) and cleanup materials for this emissions unit (K004) and C.2.b.i for all VOC emissions from painting operations (emissions unit K001) and reinforced plastic lay-up operations (emissions units K002 and K003)] per rolling, 12-month period.

3. The permittee shall collect and record the following information for each month:

a. For this emissions unit (K004):

i. the individual HAP (styrene) emission rate for all lay-up materials (resins) employed, determined in accordance with Sections C.2.a and E.1.a of these terms and conditions, in pounds per month;

ii. the individual HAP (toluene) emission rate for all cleanup materials employed [summation of (C.2.a.iv x

C.2.a.v) for all cleanup up materials] employed, in pounds per month; and

iii. the total combined HAP emissions for this emissions unit [summation of (C.3.a.i + C.3.a.ii) for all HAPs emitted from all lay-up materials (resins) and cleanup materials] employed, in pounds per month.
b. For painting operations (emissions unit K001) and reinforced plastic lay-up operations (emissions units K002 and K003):

i. the total HAP emissions.

c. The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of C.3.a.iii for all HAPs emitted by all lay-up materials (resins) and cleanup materials for emissions unit K004, and C.3.b.i for all HAP emissions from painting operations (emissions unit K001) and reinforced plastic lay-up operations (emissions units K002 and K003)], per rolling, 12-month period.

4. The permit to install for this emissions unit (K004) was evaluated based on the actual materials (coatings) 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 potentially 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: styrene
TLV (ug/m3): 85,202
Maximum Hourly Emission Rate (lbs/hr): 2.051
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2241
MAGLC (ug/m3): 4733.5
Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically 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.).

5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

a. 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 quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.6 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 12.6 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of VOCs from all emissions units at the facility exceeded 12.1 tons per year, and the actual rolling, 12-month emissions of VOCs for each such month.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which the average hourly OC emissions exceeded 2.051 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month lay-up material (resin) usage for this emissions unit exceeded 150,000 pounds per year, and the actual rolling, 12-month lay-up material (resin) usage for each such month.

6. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

7. The permittee shall submit annual reports that summarize the facility-wide emissions of each single HAP, combined HAPs, and VOCs from all emissions units at the facility. The reports shall include emission calculations, be submitted by January 31 of each year, and cover the previous calendar year.

E. **Testing Requirements**

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

Organic compound (OC) emissions shall not exceed 40 lbs/day, including emissions from cleanup materials.

Applicable Compliance Method:

i. To calculate OC emissions from the chop spray gun operation with non-atomized chop spray of resin/glass for molded and flat sheet lay-up, the permittee shall employ the following formula:

E(lay-up) = summation of (Wi x EFi)

Where

E(lay-up) = the daily organic compound emissions from all lay-up materials (resins), in pounds per day;

i = subscript denoting a specific lay-up material (resin) employed;

Wi = the weight of lay-up material (resin) "i" employed, in tons per day (pounds per day divided by 2000 pounds per ton); and

EFi = the emission factor for styrene emissions*, in pounds per ton, from lay-up material (resin) "i".

*This emissions factor is based on the styrene content of the resin and the mechanical application type (mechanical non-atomized), determined as calculated or written in Table 1, titled "Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams", from 40 CFR Part 63, Subpart WWWW (included for this permit as Attachment A, Unified Emission Factors for Open Molding of Composites).
ii. To calculate OC emissions from cleanup materials associated with the chop spray gun operation, the permittee shall employ the following formula:

E(cleanup) = C.1.d x C.1.e

Where

E(cleanup) = the daily OC emissions from all cleanup materials, in pounds per day;

C.1.d = the number of gallons of each cleanup material employed per day from Section C.1.d of these terms and conditions; and

C.1.e = the OC content of each cleanup material from Section C.1.e of these terms and conditions, in pounds per gallon.
iii. To calculate total emissions from all chop spray gun operations with non-atomized chop spray of resin/glass for molded flat sheet lay-up and all cleanup materials associated with the chop spray gun operation, the permittee shall employ the following formula:

E(total) = E(lay-up) + E(cleanup)

Where

E(total) = the daily total OC emissions from all chop spray gun operations and all cleanup materials, in pounds per day;

E(lay-up) = the daily OC emissions from all lay-up materials (resins) from Section E.1.a.i of these terms and conditions, in pounds per day; and

E(cleanup) = the daily organic compound emissions from all cleanup materials from Section E.1.a.ii of these terms and conditions, in pounds per day.
Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.051 lbs/hr, including emissions from cleanup materials.

Applicable Compliance Method:

The hourly OC emission limitation rate shall be determined by dividing the daily OC emission rate in Section C.1.f by the actual number of hours the emissions unit was in operation (Section C.1.g).
Emission Limitation:

Organic compound (OC) emissions shall not exceed 7.3 tons per year, including emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by summing the daily OC emission rates from lay-up materials (resins) and cleanup materials, as recorded in Section C.1.f of these terms and conditions, for the calendar year and dividing the sum by 2000 lbs/ton.
Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from emissions units K001, K002, K003, and K004 combined shall not exceed 9.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of HAP emissions for each single HAP.
Emission Limitation:

The emissions of combined HAPs from emissions units K001, K002, K003, and K004 combined shall not exceed 12.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.3 and maintenance of a rolling, 12-month summation of combined HAP emissions.
Emission Limitation:

Volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004 shall not exceed 12.1 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section C.2 and maintenance of a rolling, 12-month summation of VOC emissions.

2. US EPA Method 24 or formulation data shall be used to determine the VOC contents of the materials employed in this emissions unit. Formulation data shall be used to determine the HAP contents of the materials employed in this emissions unit.

F. **Miscellaneous Requirements**

1. The terms and conditions in Sections A, B, C.1, C.2, C.3, D, and E of this permit are federally enforceable.