



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
COLUMBIANA COUNTY**

CERTIFIED MAIL

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: 02-22039

Fac ID: 0215090101

DATE: 8/31/2006

MAC Manufacturing, Inc.
David Wade
14599 Commerce St.
Alliance, OH 44601

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 02-22039

Application Number: 02-22039
Facility ID: 0215090101
Permit Fee: **\$200**
Name of Facility: MAC Manufacturing, Inc.
Person to Contact: David Wade
Address: 14599 Commerce St.
Alliance, OH 44601

Location of proposed air contaminant source(s) [emissions unit(s)]:
1453 Allen Rd.
Salem, Ohio

Description of proposed emissions unit(s):
Paint spray booth.

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. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- 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 obtained before 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 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

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12. 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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. 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).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.3
single HAP	9.9
combined HAPs	24.9
PE	0.15

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

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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 - (K001) - Protectaire Spray Paint Booth, Small, Model Number 3010R, equipped with High Volume Low Pressure spray guns, fiberglass paint booth filter with a design control efficiency of 99.8 percent and two motors producing a maximum stack flow rate of 28,410 acfm.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>3.5 lbs volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for coating miscellaneous metal parts.</p> <p>VOC emissions shall not exceed 21.0 pounds per hour from coating miscellaneous metal parts.</p> <p>VOC emissions shall not exceed 40 pounds per day from use of cleanup material.</p> <p>Particulate (PE) emissions shall not exceed 0.03 pound per hour, 0.15 ton per year.</p> <p>Visible PE shall not exceed 5% opacity, as a six-minute average.</p> <p>See Sections A.2.a, b, c, d & e.</p>
OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established by OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(U)(d)	The VOC emission limitation specified by this rule is equivalent to the VOC emission limitation established by OAC rule 3745-31-05(A)(3).

OAC rule 3745-35-07(B)	See Sections A.2.a, b, c, d & e.
40 CFR Part 63, Subpart Mmmm	Not applicable. See Section A.2.f.

2. Additional Terms and Conditions

- 2.a** VOC emissions from coating miscellaneous metal parts shall not exceed 92.0 tons VOC per rolling, 12-month period.
- 2.b** VOC emissions from using cleanup materials shall not exceed 7.3 tons VOC per rolling, 12-month period.
- 2.c** Emissions of any single hazardous air pollutant (HAP) shall not exceed 9.9 tons per rolling, 12-month period and emissions of the combined HAPs shall not exceed 24.9 tons per rolling, 12-month period.
- 2.d** The coating usage shall not exceed 6 gallons per hour or 52,560 gallons per year.
- 2.e** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of coatings used in this emissions unit shall not exceed the cumulative total amount of the coatings as specified for each month in the following table:

<u>Month</u>	<u>Cumulative Amount of Coating</u>
1	4,380 gallons
2	8,760 gallons
3	13,140 gallons
4	17,520 gallons
5	21,900 gallons
6	26,280 gallons
7	30,660 gallons
8	35,040 gallons
9	39,420 gallons
10	43,800 gallons
11	48,180 gallons
12	52,560 gallons

- 2.f** This emissions unit is not subject to 40 CFR Part 63, Subpart Mmmm (MACT for Surface Coating of Miscellaneous Metal Parts) because the facility is not a major source for HAPs as established by the restriction in 2.c above.

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B. Operational Restrictions

1. The permittee shall operate and maintain the fiberglass filter in accordance with the manufacturer's recommendations while this emissions unit is in operation.
2. This emissions unit shall only employ High Volume Low Pressure (HVLP) spray guns.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number for each coating, as applied, and for each cleanup material employed;
 - b. the VOC content of each coating applied, in pounds/gallon, excluding water and exempt solvents, and, in pounds per gallon, and of each cleanup material employed, in pounds/gallon;
 - c. the amount of each single HAP, in pounds per gallon, for each coating applied and for each cleanup material employed (calculated by multiplying the weight of the coating and/or cleanup material, in lbs/gallon, by the percent weight of the single HAP component);
 - d. the volume of each coating and cleanup material employed, in gallons;
 - e. the total number of hours this emissions unit was in operation;
 - f. the VOC emissions from all the coatings, in pounds, calculated by the following equation:

E (lbs VOC/day) = the summation of (A multiplied by B) for all the coatings employed

where;

A = the VOC content of each coating, in pounds per gallon

B = volume of each coating applied, in gallons per day
 - g. the average hourly VOC emissions from all the coatings employed, in pounds/hr, calculated by dividing the daily VOC emission rate from section 1.f by the number of hours of operation from section 1.e;
 - h. the VOC emissions from the cleanup materials usage, in pounds, calculated by the following equation:

Emissions Unit ID: **K001**

E (lbs VOC/day) = the summation of (A multiplied by B) for all cleanup materials employed

where;

A = the VOC content of each cleanup material, in pounds per gallon

B = the volume of each cleanup material employed, in gallons per day

- i. the emissions of each single HAP, in pounds per day, calculated by the following equation:

E (lbs HAP/day) = the sum of (A multiplied by B) for all the coatings and cleanup materials employed

where;

A = the amount of each single HAP in each coating and cleanup material, in pounds per gallon, as recorded in 1.c above

B = the volume of each coating and cleanup material employed, in gallons per day

- j. the combined HAP emissions, in pounds, calculated by summing all the individual HAP emissions calculated in 1.i above;
- k. the total coatings usage rate, in gallons, calculated by the summing the number of gallons of all the coatings employed; and
- l. the average hourly coating usage rate, in gallons per hour, calculated by dividing the total volume of gallons of coatings employed, from section 1.k above, by the number of hours of operation, from section 1.e above.
2. The permittee shall record when the fiberglass filter is not in operation when this emissions unit is in operation. The permittee shall also record when coatings are applied by methods other than the HVLP spray guns. The records shall include the date, duration and reason.
3. The permittee shall collect and record the following information each month for this emissions unit:

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- a. the total volume of coatings applied, in gallons, calculated by summing the daily coatings usage rate, from section 1.k above, for the calendar month;
- b. During the first 12 months of operation following the issuance of this permit, the monthly cumulative total volume of all the coatings employed, in gallons;
- c. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emissions* (from the coatings usage), in tons;
- d. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emissions* (from the cleanup materials usage), in tons;
- e. After the first 12 months of operation following the issuance of this permit, the rolling 12-month emissions* of each individual HAP, in tons; and
- f. After the first 12 months of operation following the issuance of this permit, the rolling 12-month emissions* of combined HAPs.

* The monthly emissions are calculated by summing the daily emissions, from Section C.1 above, for the calendar month, divided by 2000 lbs/ton.

4. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant	Maximum emission rate, lb/hr and gram/sec	TLV, ug/m ³	MAGLC (TLV/42), ug/m ³	Predicted 1-hour maximum ground level concentration, ug/m ³
Acetone	11.46 lb/hr 1.44 g/sec	1,187,116.6	28,264.7	231.3 ug/m ³

Emissions Unit ID: K001

Butyl acetate	10.35 lb/hr 1.30 g/sec	712,638.0	16,967.6	208.8 ug/m ³
Methyl amyl ketone	3.13 lb/hr 0.39 g/sec	233,497.0	5,559.5	62.6 ug/m ³
Xylene	0.67 lb/hr 0.08 g/sec	434,192.2	10,337.9	12.8 ug/m ³
Methyl isobutyl ketone	0.54 lb/hr 0.07 g/sec	204,826.2	4,876.8	11.2 ug/m ³
VM & P Naphtha	0.37 lb/hr 0.05 g/sec	1,398,773.0	33,304.1	8.03 ug/m ³

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - 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.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant

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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 the 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.

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D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing use of noncomplying coatings, i.e., coatings exceeding 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information for this emissions unit:
 - a. an identification of each day during which the VOC emissions from the application of coatings exceeded 21.0 pounds per hour (average), and the actual calculated emission rate;
 - b. an identification of each day during which the VOC emission from the use of cleanup materials exceeded 40 pounds per day, and the actual calculated emission rate;
 - c. After the first 12 months of operation following the issuance of this permit, an identification of each month during which the VOC emissions from the coating applications exceeded 92.0 tons per rolling, 12-month period, and the actual calculated emission rate;
 - d. After the first 12 months of operation following the issuance of this permit, an identification of each month during which the VOC emissions from the cleanup materials usage exceeded 7.3 tons per rolling, 12-month period, and the actual calculated emission rate;
 - e. After the first 12 months of operation following the issuance of this permit, an identification of each month during which any single HAP emissions exceeded 9.9 tons per rolling, 12-month period, and the actual calculated emission rate;
 - f. After the first 12 months of operation following the issuance of this permit, an identification of each month during which the combined HAP emissions exceeded 24.9 tons per rolling, 12-month period, and the actual calculated emission rate;
 - g. During the first 12 months of operation following the issuance of this permit, an

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identification of each month during which the monthly cumulative volume of coatings usage exceeded the stated amounts per Section A.2;

- h. After the first 12 months of operation following the issuance of this permit, an identification of each month during which the cumulative volume of coatings applied exceeded 52,560 gallons/rolling, 12-month period;
- i. an identification of each day during which the average hourly coatings usage exceeded 6 gallons.
- j. an identification of each day when the fiberglass filter was not operated and maintained in accordance with the manufacturer's recommendations while this emissions unit was in operation; and
- k. an identification of each day when coatings were applied by methods other than the HVLP spray guns.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for coating miscellaneous metal parts.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
 - b. Emission Limitation:
VOC emissions shall not exceed 21.0 pounds per hour (average) from coating miscellaneous metal parts.

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation shall be based upon the record keeping requirements specified in Section C.

If required, compliance with the hourly allowable VOC emission limitation shall be demonstrated in accordance with Methods 18, 25, or 25A, as appropriate, of

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40 CFR Part 60, Appendix A.

- c. Emission Limitation:
VOC emissions shall not exceed 40 pounds per day from use of cleanup materials.

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation shall be based upon the record keeping requirements specified in Section C.

- d. Emission Limitations:
PE shall not exceed 0.03 pound per hour, 0.15 ton per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual limit shall be assumed as long as compliance with the hourly emission limitation is maintained.

- e. Emission Limitation:
Visible PE shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- f. Emission Limitation:
VOC emissions from coating miscellaneous metal parts shall not exceed 92.0 tons VOC per rolling, 12-month period.

Applicable Compliance Method:

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

- g. Emission Limitation:
VOC emissions from using cleanup materials shall not exceed 7.3 tons VOC per rolling, 12-month period.

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Applicable Compliance Method:

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

h. Emission Limitation:

Emissions of any single HAP shall not exceed 9.9 tons per rolling, 12-month period, and emissions of combined HAPs shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual allowable HAP limitations above shall be based upon the record keeping requirements specified in Section C.

i. Coatings Usages:

6 gallons of coatings/hr (average)

52,560 gallons of coatings/rolling, 12-month period

Monthly cumulative coatings usage rates (see section A.2)

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

1. The terms and conditions of this Permit-to-Install (PTI) supercede those in PTI # 17-1039 issued on April 8, 1992.
2. The terms and conditions in Sections A, B, C.1 -3, D and E are federally enforceable.