

Facility ID: 0278080612 Issuance type: Final 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 P001](#)
- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit R002](#)
- [Go to Part II for Emissions Unit R003](#)

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Facility ID: 0278080612 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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

Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Abrasive Blasting Operation with capture and control system	OAC rule 3745-31-05(A)(3) (PTI 02-1593)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 2.25 pounds per hour, based on a process weight of 875 pounds per hour.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The impingement chamber shall be used at all times during blasting operations. The impingement chamber shall be maintained in good working condition. Impingement screens shall be cleaned regularly and replaced when necessary.
2. Black Beauty or similar blasting material shall be used at all times for blasting.
3. The blasting area floor shall be kept in reasonably clean condition at all times.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the total amount of abrasive blasting material used; and
 - b. the total hours of operation of the blasting operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the

daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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 Limitation:

PE shall not exceed 2.25 pounds per hour, based on a process weight of 875 pounds per hour.

Applicable Compliance Method:

To determine the actual emission rate for particulate emissions, the following equation may be used:

$$E = (27 \text{ lb PE}/1000 \text{ lb abrasive material})(AB)(1-.935) / (H)$$

where:

E = the average hourly emission rate of PE;

27 lbs/1000 lbs abrasive material = the emission factor for particulates from AP-42, Table 13.2.6-1, "Emission Factors for Uncontrolled Abrasive Blasting Operations", Oct. 1997;

AB = the amount of abrasive material used in this operation per day;

H = the total hours this process operates per day; and

1-.935 = a correction for the collector efficiency of 93.5.

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

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. None

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Facility ID: 0278080612 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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

Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the

applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray Paint Booth	OAC rule 3745-31-05(A)(3)	See section A.2.a below.
Spray Booth #1	(PTI 02-1593)	
	OAC rule 3745-21-09(U)(1)(b)	See section A.2.b below.
	OAC rule 3745-21-09(U)(2)(f)(ii)	See section A.2.c below.
	OAC rule 3745-21-09(U)(1)(c)	See section A.2.d below.

2. Additional Terms and Conditions

- (a) The maximum amount of coating material, as applied, which includes prime coat and finish coat, from emissions units R001, R002 and R003, combined, shall not exceed 60 gallons per day.
 The volatile organic compound (VOC) content of the zinc rich primer coatings employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
 The VOC content of the final top coat coatings employed in this emissions unit shall not exceed 4.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
 The VOC content of extreme performance coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

B. Operational Restrictions

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

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emission unit:
 - a. the name, identification number, and classification (see A.2 above) of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC contents of all zinc rich primer coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1;
 - d. the daily volume-weighted average VOC contents of all final top coat coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1; and
 - e. the daily volume-weighted average VOC contents of all extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1.
- 2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon; and
 - d. the total VOC emissions from all coatings and cleanup materials, in pounds or tons.
- 3. The permittee shall record daily the total gallons of coatings employed in emissions units R001, R002 and R003, combined.

D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the daily volume-weighted average VOC contents, or the total coating usage from emissions units R001, R002 and R003, combined, exceed(s) the applicable limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.
- 2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

 The volatile organic compound (VOC) content of the zinc rich primer coatings employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

 Applicable Compliance Method:

 Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
 Emission Limitation:

The VOC content of the final top coat coatings employed in this emissions unit shall not exceed 4.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
Emission Limitation:

The VOC content of extreme performance coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
Emission Limitation:

The maximum amount of coating material, as applied, which includes prime coat and finish coat, from emissions units R001, R002 and R003, combined, shall not exceed 60 gallons per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.3.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0278080612 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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

Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray Paint Booth	OAC rule 3745-31-05(A)(3)	See section A.2.a below.
Spray Booth #2	(PTI 02-1593)	
	OAC rule 3745-21-09(U)(1)(b)	See section A.2.b below.
	OAC rule 3745-21-09(U)(2)(f)(ii)	See section A.2.c below.
	OAC rule 3745-21-09(U)(1)(c)	See section A.2.d below.

2. Additional Terms and Conditions

- (a) The maximum amount of coating material, as applied, which includes prime coat and finish coat, from emissions units R001, R002 and R003, combined, shall not exceed 60 gallons per day.
The volatile organic compound (VOC) content of the zinc rich primer coatings employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
The VOC content of the final top coat coatings employed in this emissions unit shall not exceed 4.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
The VOC content of extreme performance coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for this emission unit:
 - a. the name, identification number, and classification (see A.2 above) of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC contents of all zinc rich primer coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1;
 - d. the daily volume-weighted average VOC contents of all final top coat coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1; and
 - e. the daily volume-weighted average VOC contents of all extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1.
 2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon; and
 - d. the total VOC emissions from all coatings and cleanup materials, in pounds or tons.
 3. The permittee shall record daily the total gallons of coatings employed in emissions units R001, R002 and R003, combined.
- D. Reporting Requirements**
1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the daily volume-weighted average VOC contents, or the total coating usage from emissions units R001, R002 and R003, combined, exceed(s) the applicable limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.
 2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

The volatile organic compound (VOC) content of the zinc rich primer coatings employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
Emission Limitation:

The VOC content of the final top coat coatings employed in this emissions unit shall not exceed 4.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
Emission Limitation:

The VOC content of extreme performance coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
Emission Limitation:

The maximum amount of coating material, as applied, which includes prime coat and finish coat, from emissions units R001, R002 and R003, combined, shall not exceed 60 gallons per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.3.
- F. Miscellaneous Requirements**
1. None

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Facility ID: 0278080612 Emissions Unit ID: R003 Issuance type: Final State Permit To Operate

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

Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray Paint Booth	OAC rule 3745-31-05(A)(3)	See section A.2.a below.
Spray Booth #3	(PTI 02-1593)	
	OAC rule 3745-21-09(U)(1)(b)	See section A.2.b below.
	OAC rule 3745-21-09(U)(2)(f)(ii)	See section A.2.c below.
	OAC rule 3745-21-09(U)(1)(c)	See section A.2.d below.

2. Additional Terms and Conditions

- (a) The maximum amount of coating material, as applied, which includes prime coat and finish coat, from emissions units R001, R002 and R003, combined, shall not exceed 60 gallons per day. The volatile organic compound (VOC) content of the zinc rich primer coatings employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average. The VOC content of the final top coat coatings employed in this emissions unit shall not exceed 4.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average. The VOC content of extreme performance coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

B. Operational Restrictions

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

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emission unit:
 - a. the name, identification number, and classification (see A.2 above) of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC contents of all zinc rich primer coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1;
 - d. the daily volume-weighted average VOC contents of all final top coat coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1; and
 - e. the daily volume-weighted average VOC contents of all extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,1.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon; and
 - d. the total VOC emissions from all coatings and cleanup materials, in pounds or tons.

3. The permittee shall record daily the total gallons of coatings employed in emissions units R001, R002 and R003, combined.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the daily volume-weighted average VOC contents, or the total coating usage from emissions units R001, R002 and R003, combined, exceed(s) the applicable limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

The volatile organic compound (VOC) content of the zinc rich primer coatings employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

Emission Limitation:

The VOC content of the final top coat coatings employed in this emissions unit shall not exceed 4.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

Emission Limitation:

The VOC content of extreme performance coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

Emission Limitation:

The maximum amount of coating material, as applied, which includes prime coat and finish coat, from emissions units R001, R002 and R003, combined, shall not exceed 60 gallons per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.3.

F. Miscellaneous Requirements

1. None