



State of Ohio Environmental Protection Agency

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
FRANKLIN COUNTY  
Application No: 01-12128  
Fac ID: 0125042195**

**DATE: 9/20/2007**

Horton Emergency Vehicle Company  
Brian Lehman  
3800 McDowell  
Grove City, OH 43123

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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*

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

CC: USEPA

CDO



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Permit To Install  
Terms and Conditions

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Issue Date: 9/20/2007  
Effective Date: 9/20/2007

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**FINAL PERMIT TO INSTALL 01-12128**

Application Number: 01-12128

Facility ID: 0125042195

Permit Fee: **\$3000**

Name of Facility: Horton Emergency Vehicle Company

Person to Contact: Brian Lehman

Address: 3800 McDowell  
Grove City, OH 43123

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3800 McDowell Road  
Grove City, Ohio**

Description of proposed emissions unit(s):

**Modification of 14 emission units previously permitted by PTI 01-08969 and one new 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

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

#### 14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### 15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

### B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	74.07
Individual HAP	9.90
Combined HAPs	21.60

**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) - Devilbiss paint booth No. 1; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from coatings and cleanup materials employed by this emissions unit shall not exceed 6.48 tons per rolling 12- month period.  See A.2.d, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(1)(d)	See 2.b below.
OAC rule 3745-21-09(U)(2)(d)	See B.5 below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr. See A.2.c below.
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.

**2. Additional Terms and Conditions**

- 2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than ten tons per year.
- 2.b** This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(d).
- 2.c** The hourly PE limitation for this emissions unit is greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.d** Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 1878 gallons of topcoat per rolling, 12 month period.
  - ii. 81 gallons of clean up material per rolling, 12 month period.

## **B. Operational Restrictions**

- 1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the topcoat usage, upon issuance of this permit. The maximum annual topcoat usage for this emissions unit shall not exceed 1878 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 81 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
- 3. The maximum VOC content of any topcoats, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.
- 4. The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.
- 5. The number of motor vehicles coated in one day shall not exceed thirty-four.
- 6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each topcoat and cleanup material employed by this emissions unit;
  - b. the VOC content for each topcoat and cleanup material, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each topcoat and cleanup material employed by this emissions unit;
  - d. the rolling, 12-month summation of the topcoat usage, in gallons;
  - e. the rolling, 12-month summation of the cleanup material usage, in gallons;
  - f. the total VOC emissions from all topcoats and cleanup materials employed by this emissions unit, in tons per rolling, 12-month period; and
  - g. the number of motor vehicles coated per day.
  
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification number of each topcoat, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each topcoat in pounds of individual HAP per gallon of topcoat, as applied;
  - c. the total combined HAP content for each HAP of each topcoat in pounds of combined HAPs per gallon of topcoat, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each topcoat employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. The 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.

#### D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings and/or clean up materials. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- 2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated in any day ever exceeded thirty-four. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- 3. The permittee shall notify Ohio EPA, Central 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 Ohio EPA, Central District Office within 45 days after the exceedance occurs.
- 4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling 12-month topcoat usage limitation;
  - b. the rolling 12-month cleanup material usage limitation;
  - c. the total VOC emissions rates for all topcoats and cleanup materials employed by this emissions unit in tons per rolling, 12-month period;

- d. the total emissions of each individual HAP from all materials employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
- e. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

- 5. The permittee shall also 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. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

## **E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.  
  
Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.
  - b. Emission Limitation: Volatile Organic Compound (VOC) emissions from coatings and cleanup materials shall not exceed 6.48 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.
  - c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.
  - d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- h. Emissions Limitation: The maximum annual topcoat usage for this emissions unit shall not exceed 1878 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- i. Emissions Limitation: The maximum annual clean up usage for this emissions unit shall not exceed 81 gallons, based upon a rolling, 12 month summation of the clean up usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

## **F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

- 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 - (K002) - Devilbiss paint booth No.2; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>Volatile Organic Compound (VOC) emissions from coatings and cleanup materials employed by this emissions unit shall not exceed 8.50 tons per rolling 12- month period.</p> <p>See A.2.d, B.1, B.2, B.3 and B.4 below.</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.</p> <p>Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.</p>
OAC rule 3745-21-09(U)(1)(d)	See 2.b below.
OAC rule 3745-21-09(U)(2)(d)	See B.5 below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr. See A.2.c below.
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.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than ten tons per year.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(d).
- 2.c The hourly PE limitation for this emissions unit is greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.d Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 2430 gallons of topcoat per rolling, 12 month period.
  - ii. 141 gallons of clean up material per rolling, 12 month period.

## B. Operational Restrictions

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the topcoat usage, upon issuance of this permit. The maximum annual topcoat usage for this emissions unit shall not exceed 2430 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 141 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any topcoats, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.
5. The number of motor vehicles coated in one day shall not exceed thirty-four.
6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each topcoat and cleanup material employed by this emissions unit;
  - b. the VOC content for each topcoat and cleanup material, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each topcoat and cleanup material employed by this emissions unit;
  - d. the rolling, 12-month summation of the topcoat usage, in gallons;
  - e. the rolling, 12-month summation of the cleanup material usage, in gallons;
  - f. the total VOC emissions from all topcoats and cleanup materials employed by this emissions unit, in tons per rolling, 12-month period; and
  - g. the number of motor vehicles coated per day.
  
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification number of each topcoat, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each topcoat in pounds of individual HAP per gallon of topcoat, as applied;
  - c. the total combined HAP content for each HAP of each topcoat in pounds of combined HAPs per gallon of topcoat, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each topcoat employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);

- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. The 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.

#### **D. Reporting Requirements**

- 1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings and/or clean up materials. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- 2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated in any day ever exceeded thirty-four. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- 3. The permittee shall notify Ohio EPA, Central 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 Ohio EPA, Central District Office within 45 days after the exceedance occurs.
- 4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling 12-month topcoat usage limitation;
  - b. the rolling 12-month cleanup material usage limitation;
  - c. the total VOC emissions rates for all materials employed by this emission unit in tons per rolling, 12-month period;

- d. the total emissions of each individual HAP from all topcoats and cleanup materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
- e. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

- 5. The permittee shall also 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. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

## **E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.  
  
Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.
  - b. Emission Limitation: Volatile Organic Compound (VOC) emissions from coatings and cleanup materials shall not exceed 8.50 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.
  - c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.
  - d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.26 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- h. Emissions Limitation: The maximum annual topcoat usage for this emissions unit shall not exceed 2430 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- i. Emissions Limitation: The maximum annual clean up usage for this emissions unit shall not exceed 141 gallons, based upon a rolling, 12 month summation of the clean up usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

## **F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K003) - Devilbiss paint booth No.3; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from primers and topcoats employed by this emissions unit shall not exceed 7.51 tons per rolling 12- month period.  See A.2.d, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C)) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(U)(1)(d)	See A.2.b and A.2.c below.
OAC rule 3745-21-09(U)(2)(d)	See B.5 below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.911 lb/hr.
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.

**2. Additional Terms and Conditions**

- 2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than ten tons per year.
- 2.b** The maximum VOC content of any primer, as applied, shall not exceed 3.50 lbs of VOC per gallon.
- 2.c** This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(d) with regard to the application of topcoats.
- 2.d** Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 600 gallons of primer per rolling, 12 month period.
  - ii. 1950 gallons of topcoat per rolling, 12 month period.

**B. Operational Restrictions**

- 1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the primer usage, upon issuance of this permit. The maximum annual primer usage for this emissions unit shall not exceed 600 gallons, based upon a rolling, 12 month summation of the primer usage figures.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the topcoat usage, upon issuance of this permit. The maximum annual topcoat usage for

this emissions unit shall not exceed 1950 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.

3. The maximum VOC content of any primer, as applied, shall not exceed 3.50 lbs of VOC per gallon.
4. The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon.
5. The number of motor vehicles coated in one day shall not exceed thirty-four.
6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each primer and topcoat employed by this emissions unit;
  - b. the VOC content for each primer and topcoat, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each primer and topcoat employed by this emissions unit;
  - d. the rolling, 12-month summation of the primer usage, in gallons;
  - e. the rolling, 12-month summation of the topcoat usage, in gallons;
  - f. the total VOC emissions from all primer and topcoat employed by this emissions unit, in tons per rolling, 12-month period;
  - g. the density and percent weight solid content of each primer and topcoat employed by this emissions unit;
  - h. the total number of hours the emissions unit was operated;
  - i. the combined hourly average PE for all primers and topcoats employed; and
  - j. the number of motor vehicles coated per day.

2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification number of each primer, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each primer in pounds of individual HAP per gallon of primer, as applied;
  - c. the total combined HAP content for each HAP of each primer in pounds of combined HAPs per gallon of primer, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each primer employed;
  - e. the name and identification of each topcoat employed;
  - f. the individual HAP content for each HAP of each topcoat in pounds of individual HAP per gallon topcoat, as applied;
  - g. the total combined HAP content of each topcoat in pounds of combined HAPs per gallon of topcoat, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each topcoat employed;
  - i. the total individual HAP emissions for each HAP from all primers and topcoats in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all primers and topcoats employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The 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.

## **D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated in any day ever exceeded thirty-four. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
3. The permittee shall notify Ohio EPA, Central 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 Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling 12-month primer usage limitation;
  - b. the rolling 12-month topcoat material usage limitation;
  - c. the total VOC emissions rates for all primers and topcoats employed by this emissions unit in tons per rolling, 12-month period;
  - d. the hourly PE limitation;
  - e. the total emissions of each individual HAP from all materials employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - f. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

5. The permittee shall also 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. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: Particulate emissions (PE) shall not exceed 0.911 lb/hr from coating operations.

Applicable Compliance Method: To determine compliance with the hourly emission rate for particulate, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = actual coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.14 for air spray guns)

CE = control efficiency of the control equipment (0.988 for the dry filtration system)

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation: Volatile Organic Compound (VOC) emissions from coatings and cleanup materials shall not exceed 7.51 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emissions Limitation: The maximum VOC content of any primer, as applied, shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- h. Emissions Limitation: The maximum annual primer usage for this emissions unit shall not exceed 600 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- i. Emissions Limitation: The maximum annual topcoat usage for this emissions unit shall not exceed 1950 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K004) - Devilbiss paint booth No. 4; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid title V)	Volatile Organic Compound (VOC) emissions from primers employed by this emissions unit shall not exceed 4.83 tons per rolling 12- month period.  See A.2.b, B.1 and B.2 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(1)(d)	See B.2 below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.918 lb/hr.
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.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than ten tons per year.

- 2.b** Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
- i. 2760 gallons of primer per rolling, 12 month period.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the primer usage, upon issuance of this permit. The maximum annual primer usage for this emissions unit shall not exceed 2760 gallons, based upon a rolling, 12 month summation of the primer usage figures.
2. The maximum VOC content of any primer, as applied, shall not exceed 3.50 lbs of VOC per gallon.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each primer employed by this emissions unit;
  - b. the VOC content for each primer, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each primer employed by this emissions unit;
  - d. the rolling, 12-month summation of the primer usage, in gallons;
  - e. the total VOC emissions from all primers employed by this emissions unit, in tons per rolling, 12-month period; and
  - f. the density and percent weight solid content of each primer employed by this emissions unit;
  - g. the total number of hours the emissions unit was operated; and
  - h. the combined hourly average PE for all primers employed;

2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification number of each primer, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each primer in pounds of individual HAP per gallon of primer, as applied;
  - c. the total combined HAP content for each HAP of each primer in pounds of combined HAPs per gallon of primer, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each primer employed;
  - e. the name and identification of each cleanup material employed;
  - f. the total individual HAP emissions for each HAP from all primers in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - g. the total combined HAP emissions from all primers employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).
  
3. 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.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

#### **D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify Ohio EPA, Central 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 Ohio EPA, Central District Office within 45 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling 12-month primer usage limitation;
  - b. the total VOC emissions rates for all primers employed by this emissions unit in tons per rolling, 12-month period;
  - c. the hourly PE limitation;
  - d. the total emissions of each individual HAP from all materials employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - e. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

5. The permittee shall also 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. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

## E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: Particulate emissions (PE) shall not exceed 0.918 lb/hr from coating operations.

Applicable Compliance Method: To determine compliance with the hourly emission rate for particulate, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = actual coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.14 for air spray guns)

CE = control efficiency of the control equipment (0.988 for the dry filtration system)

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation: Volatile Organic Compound (VOC) emissions from primers employed by this emissions unit shall not exceed 4.83 tons per rolling 12- month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C1. of this permit.

- c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emissions Limitation: The maximum VOC content of any primer, as applied, shall not exceed 3.5 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR

Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emissions Limitation: The maximum annual primer usage for this emissions unit shall not exceed 2760 gallons, based upon a rolling, 12 month summation of the primer usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

## **F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K005) - Paint department final miscellaneous coating; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 4.62 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 86 gallons of primer per rolling, 12 month period.
  - ii. 1333 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii) because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual primer usage for this emissions unit shall not exceed 86 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 1333 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.

- e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

4. The permit to install for emissions units K005 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" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 9.36 (represents 32.2% of total emissions rate increase = 29.06 lb/hr)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 124

MAGLC (ug/m<sup>3</sup>): 4,476

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 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.

#### **D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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**Emissions Unit ID: K005**

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation: VOC emissions shall not exceed 4.62 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.

c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

e. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

f. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in

section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 86 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- h. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 1333 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

## **F. Miscellaneous Requirements**

- 1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.

**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 - (K006) - Line area final coating; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 7.68 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 2259 gallons of coating per rolling, 12 month period.
  - ii. 79 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii) because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

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**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K006**

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 2259 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 79 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.

- e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 7.68 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 2259 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual cleanup material usage for this emissions unit shall not exceed 79 gallons, based upon a rolling, 12 month summation of the cleanup material usage figures.

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**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K006**

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K007) - NY line area final coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 0.23 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 60 gallons of coating per rolling, 12 month period, and
  - ii. 24 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii)

because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 60 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 24 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 5.01 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.
  - e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material

Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 0.23 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 5.01 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 60 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 24 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K008) - Batch lot miscellaneous product assembly coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 3.79 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 697 gallons of coating per rolling, 12 month period, and
  - ii. 462 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii)

because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 697 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 462 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.
  - e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material

Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 3.79 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 697 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 462 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K009) - Cabinet shop table No. 1 coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 1.57 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 573 gallons of coating per rolling, 12 month period, and
  - ii. 41 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii)

because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 573 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 41 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 5.01 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.
  - e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material

**Horton Emergency Vehicle Company**

**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K009**

Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 1.57 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 5.01 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 573 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 41 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K010) - Line installation table No. 2 coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 0.20 tons per rolling 12- month period.  See B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 48 gallons of coating per rolling, 12 month period, and
  - ii. 24 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii)

because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 48 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 24 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 5.01 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.
  - e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material

Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

#### **D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 0.20 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 5.01 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 48 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 24 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K011) - Fabrication area coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 5.24 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 1570 gallons of coating per rolling, 12 month period, and
  - ii. 24 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii)

because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

## **B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 1570 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 24 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

## **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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.
  - e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material

Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 5.24 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 1570 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 24 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").

**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 - (K012) - Delivery area coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 3.60 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(2)(e)(iii)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 276 gallons of coating per rolling, 12 month period, and
  - ii. 826 gallons of clean up material per rolling, 12 month period.
- 2.b This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii)

because the emissions unit never employs more than 10 gallons per day when coating miscellaneous metal parts.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 276 gallons, based upon a rolling, 12 month summation of the coating usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 826 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.
4. The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

**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 of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed; and
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon, excluding water and exempt solvents, as applied;

- c. the number of gallons applied, of each material;
  - d. the rolling, 12-month summation of the material usage, in gallons.
  - e. the total VOC emissions from all materials employed, in tons per rolling, 12-month period.
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material

Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all of the following:
  - a. the rolling 12-month material usage;
  - b. the sum of the total VOC emissions rates for all materials employed by this emissions unit in tons per rolling, 12-month period;
  - c. the total emissions of each individual HAP from all materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

3. The permittee shall also 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: VOC emissions shall not exceed 3.60 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K013 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 6.57 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 6.51 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.2. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual material usage for this emissions unit shall not exceed 276 gallons, based upon a rolling, 12 month summation of the material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual clean up material usage for this emissions unit shall not exceed 826 gallons, based upon a rolling, 12 month summation of the material usage figures.

**Horton Emergency Vehicle Company**

**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K012**

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.

**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 - (K013) - Paint department - miscellaneous preparation coating operation; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Volatile Organic Compound (VOC) emissions from materials employed by this emissions unit shall not exceed 9.84 tons per rolling 12- month period.  See A.2.a, B.1, B.2, B.3 and B.4 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-09(U)(1)(d)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 17,649 gallons of coating per rolling, 12 month period, and
  - ii. 1290 gallons of clean up material per rolling, 12 month period.
- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).

**Horton Emergency Vehicle Company**

**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K013**

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 17,649 gallons, based upon a rolling, 12 month summation of the primer usage figures.
2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the clean up usage, upon issuance of this permit. The maximum annual clean up usage for this emissions unit shall not exceed 1290 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.
3. The maximum VOC content of any coating, as applied, shall not exceed 0.60 lbs of VOC per gallon.
4. The maximum VOC content of clean up material shall not exceed 7.05 lbs of VOC per gallon.
5. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed by this emissions unit;
  - b. the VOC content for each coating and cleanup material, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each coating and cleanup material employed by this emissions unit;
  - d. the rolling, 12-month summation of the coating usage, in gallons;
  - e. the rolling, 12-month summation of the cleanup material usage, in gallons;
  - f. the total VOC emissions from all coating and cleanup materials employed by this emissions unit, in tons per rolling, 12-month period; and

2. The permittee shall collect and record the following information each month for this emission unit:
  - a. the name and identification number of each coating, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The 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.

4. The permit to install for emissions units K013 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" pollutant(s):

Pollutant: Chlorodifluoromethane

TLV (mg/m3): 3537

Maximum Hourly Emission Rate (lbs/hr): 0.55 (represents 2.7% of total emissions rate increase = 20.28 lb/hr)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 420

MAGLC (ug/m3): 84,214

Pollutant: Diethanolamine

TLV (mg/m3): 2.0

Maximum Hourly Emission Rate (lbs/hr): 0.22 (represents 1.0% of total emissions rate increase = 20.28 lb/hr)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.5

MAGLC (ug/m3): 47.6

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 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.

#### **D. Reporting Requirements**

- 1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings and/or clean up materials. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- 2. The permittee shall notify Ohio EPA, Central 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 Ohio EPA, Central District Office within 45 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling 12-month coating usage limitation;
  - b. the rolling 12-month cleanup material usage limitation;
  - c. the total VOC emissions rates for all materials employed by this emission unit in tons per rolling, 12-month period;
  - d. the total emissions of each individual HAP from all coatings and cleanup materials, employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - e. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

4. The permittee shall also 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. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: Volatile Organic Compound (VOC) emissions from coatings and cleanup materials shall not exceed 9.84 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.
  - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.
  - c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emissions Limitation: The maximum VOC content of any coating, as applied, shall not exceed 0.60 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: The maximum VOC content of cleanup material shall not exceed 7.05 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum annual coating usage for this emissions unit shall not exceed 17,649 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- g. Emissions Limitation: The maximum annual clean up usage for this emissions unit shall not exceed 1290 gallons, based upon a rolling, 12 month summation of the clean up usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**Horton Emergency Vehicle Company**

**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K013**

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.

**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 - (K014) - Kroyer paint booth No. 5**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid NSR)	<p>Volatile Organic Compound (VOC) emissions from primers and topcoats employed by this emissions unit shall not exceed 7.83 tons per rolling 12- month period.</p> <p>See A.2.d, B.1, B.2, B.3 and B.4 below</p>
OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	<p>Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.</p> <p>Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.</p>
OAC rule 3745-21-09(U)(1)(d)	See A.2.b and A.2.c below.
OAC rule 3745-21-09(U)(2)(d)	See B.5 below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.746 lb/hr.
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.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than ten tons per year.

- 2.b** The maximum VOC content of any primer, as applied, shall not exceed 3.50 lbs of VOC per gallon.
- 2.c** This emissions unit is exempt from the VOC emission limitations specified in OAC rule 3745-21-09(U)(1)(d) pursuant to OAC rule 3745-21-09(U)(2)(d) with regard to the application of topcoats.
- 2.d** Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 780 gallons of primer per rolling, 12 month period, and
  - ii. 1950 gallons of topcoat per rolling, 12 month period.

## **B. Operational Restrictions**

- 1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the primer usage, upon issuance of this permit. The maximum annual primer usage for this emissions unit shall not exceed 780 gallons, based upon a rolling, 12 month summation of the primer usage figures.
- 2. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the topcoat usage, upon issuance of this permit. The maximum annual topcoat usage for this emissions unit shall not exceed 1950 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.
- 3. The maximum VOC content of any primer, as applied, shall not exceed 3.50 lbs of VOC per gallon.
- 4. The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon.
- 5. The number of motor vehicles coated in one day shall not exceed thirty-four.
- 6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

## **C. Monitoring and/or Recordkeeping Requirements**

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

- a. the name and identification of each primer and topcoat employed by this emissions unit;
  - b. the VOC content for each primer and topcoat, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each primer and topcoat employed by this emissions unit;
  - d. the rolling, 12-month summation of the primer usage, in gallons;
  - e. the rolling, 12-month summation of the topcoat usage, in gallons;
  - f. the total VOC emissions from all primer and topcoat employed by this emissions unit, in tons per rolling, 12-month period; and
  - g. the density and percent weight solid content of each primer and topcoat employed by this emissions unit;
  - h. the total number of hours the emissions unit was operated;
  - i. the combined hourly average PE for all primers and topcoats employed; and
  - j. the number of motor vehicles coated per day.
2. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification number of each primer, as applied;
  - b. the individual HAP<sup>1</sup> content for each HAP of each primer in pounds of individual HAP per gallon of primer, as applied;
  - c. the total combined HAP content for each HAP of each primer in pounds of combined HAPs per gallon of primer, as applied (sum of all individual HAP contents from b);
  - d. the number of gallons of each primer employed;
  - e. the name and identification of each topcoat employed;
  - f. the individual HAP content for each HAP of each topcoat in pounds of individual HAP per gallon topcoat, as applied;

- g. the total combined HAP content of each topcoat in pounds of combined HAPs per gallon of topcoat, as applied (sum of all individual HAP contents from f);
- h. the number of gallons of each topcoat employed;
- i. the total individual HAP emissions for each HAP from all primers and topcoats in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all primers and topcoats employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. The 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.
- 4. The permit to install for emissions units K014 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" pollutant(s):

Pollutant: Xylene(s)

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.14 (represents 14% of total emissions rate increase = 15.25 lb/hr)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 165.2

MAGLC (ug/m3): 926.2

- 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 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.

**Horton Emergency Vehicle Company**

**PTI Application: 01-12128**

**Issued: 9/20/2007**

**Facility ID: 0125042195**

**Emissions Unit ID: K014**

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the number of motor vehicles coated in any day ever exceeded thirty-four. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
3. The permittee shall notify Ohio EPA, Central 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 Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling 12-month primer usage limitation;
  - b. the rolling 12-month topcoat material usage limitation;
  - c. the total VOC emissions rates for all primers and topcoats employed by this emissions unit in tons per rolling, 12-month period;
  - d. the hourly PE limitation;
  - e. the total emissions of each individual HAP from all materials employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
  - f. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

5. The permittee shall also 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. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: Particulate emissions (PE) shall not exceed 0.746 lb/hr from coating operations.

Applicable Compliance Method: To determine compliance with the hourly emission rate for particulate, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1-TE) \cdot (1-CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = actual coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.14 for air spray guns)

CE = control efficiency of the control equipment (0.988 for the dry filtration system)

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation: Volatile Organic Compound (VOC) emissions from coatings and cleanup materials shall not exceed 7.83 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emissions Limitation: The maximum VOC content of any primer, as applied, shall not exceed 3.50 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emissions Limitation: The maximum VOC content of any topcoat, as applied, shall not exceed 6.63 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- h. Emissions Limitation: The maximum annual primer usage for this emissions unit shall not exceed 780 gallons, based upon a rolling, 12 month summation of the coating usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- i. Emissions Limitation: The maximum annual topcoat usage for this emissions unit shall not exceed 1950 gallons, based upon a rolling, 12 month summation of the topcoat usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

**F. Miscellaneous Requirements**

None

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

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

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

**Operations, Property, and/or Equipment - (P001) - Paint mix room; modification to PTI 01-08969 issued 3/28/2006.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Organic Compound (OC) emissions from materials employed by this emissions unit shall not exceed 2.15 tons per rolling 12-month period.  See A.2.a, B.1 and B.2 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.  Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.
OAC rule 3745-21-07(G)(2)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12128 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):
  - i. 738 gallons of clean up material per rolling, 12 month period.
- 2.b OC emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

**B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the cleanup material usage, upon issuance of this permit. The maximum annual cleanup material usage for this emissions unit shall not exceed 738 gallons, based upon a rolling, 12 month summation of the clean up usage figures.
2. The maximum OC content of cleanup material, as applied, shall not exceed 5.84 lbs of OC per gallon, excluding water and exempt solvents.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the number of gallons of each coating and photochemically reactive cleanup material employed each hour of the day;
  - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day; and
  - f. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour for each hour of the day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each cleanup material employed by this emissions unit;

- b. the OC content for each cleanup material, in pounds per gallon, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each cleanup material employed by this emissions unit;
  - e. the rolling, 12-month summation of the cleanup material usage, in gallons;
  - f. the total OC emissions from all cleanup material employed by this emissions unit, in tons per rolling, 12-month period; and
3. The permittee shall collect and record the following information each month for this emission unit:
- a. the name and identification of each cleanup material employed;
  - b. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
  - c. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
  - d. the number of gallons of each cleanup material employed;
  - e. the total individual HAP emissions for each HAP from all cleanup materials employed, in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
  - f. the total combined HAP emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

## **D. Reporting Requirements**

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

- a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions exceeded 8 pounds/hour, and the actual average hourly OC emissions for each such day; and
  - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions exceeded 40 pounds/day, and the actual OC emissions for such a day.
2. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
  3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
    - a. the rolling 12-month cleanup material usage limitation;
    - b. the total OC emissions rates for all primers and topcoats employed by this emissions unit in tons per rolling, 12-month period;
    - c. the total emissions of each individual HAP from all materials employed by emissions unit K001 through K014 and P001, in tons per rolling, 12-month period; and
    - d. the total emissions of all HAPs for K001 through K014 and P001 in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

4. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Along with the annual reports submittal of the total OC emissions, the permittee shall also submit all OC and single HAP and combined HAP emissions (i.e. permanent exempt and/or de minimus emissions units) generated by the facility.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. **Emission Limitations:** On any day when employing photochemically reactive cleanup materials, emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day.

Applicable Compliance Limitation: Compliance with the hourly and daily OC emission limits, when using photochemically reactive materials, shall be based upon the record keeping requirements as specified in Section C.1 of this permit.

- b. Emission Limitation: Organic Compound (OC) emissions from coatings and cleanup materials shall not exceed 2.15 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.

- c. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K014 and P001 shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units K001 through K014 and P001 shall not exceed 21.6 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- e. Emissions Limitation: The maximum VOC content of any cleanup material, as applied, shall not exceed 5.84 lbs of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based on manufacturer specific formulation data and the recordkeeping requirements as specified in section C.1. If required, USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Ohio EPA, Central District Office and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- f. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR

Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emissions Limitation: The maximum annual cleanup material usage for this emissions unit shall not exceed 738 gallons, based upon a rolling, 12 month summation of the cleanup material usage figures.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.2 of this permit.

## **F. Miscellaneous Requirements**

1. The terms and conditions of this permit supercede those identified in PTI 01-08969 issued 3/28/2006.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), 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").