



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
WAYNE COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 02-17222**

**Fac ID: 0285010336**

**DATE:** 1/25/2005

Premier Metal Coating Inc.  
Keith Eriksen  
715 Smithville Rd  
Orrville, OH 44667

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

CC: USEPA

NEDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 1/25/2005  
Effective Date: 1/25/2005**

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**FINAL PERMIT TO INSTALL 02-17222**

Application Number: 02-17222  
Facility ID: 0285010336  
Permit Fee: **\$1200**  
Name of Facility: Premier Metal Coating Inc.  
Person to Contact: Keith Eriksen  
Address: 715 Smithville Rd  
Orrville, OH 44667

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

**715 Smithville Rd  
Orrville, Ohio**

Description of proposed emissions unit(s):

**3 dip tank lines.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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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

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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.

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**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	80.0

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Dip tank #1 followed by a natural gas oven, coating miscellaneous metal parts with coatings dried less than 200 degrees F.	OAC rule 3745-31-05(A)(3)	See A.2.b below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(2)(c)	See A.2 a below.
	OAC rule 3745-35-07(B)	See A.2.c and A.2.d below

### 2. Additional Terms and Conditions

- 2.a The volatile organic compound (VOC) content shall not exceed 3.5 pounds per gallon of coating, as applied, excluding water and exempt solvent.
- 2.b VOC emissions from all coatings, and additional solvents shall not exceed 28.0 pounds per hour. The short term emission limitation for VOC established above reflects the emissions unit's potential to emit using 8 gallons per hour maximum application rate and 3.5 pounds per gallon maximum VOC content; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.c VOC emissions shall not exceed 40.0 tons per rolling, 12-month period from this emissions unit.
- 2.d Emissions of each individual HAP shall not exceed 9.9 tons per rolling, 12-month period

from all emissions units at this facility. Emissions of total, combined HAPs shall not exceed 24.9 tons per rolling, 12-month period from all emissions units at this facility.

- 2.e** The permittee adds VOC materials to the dip tanks associated with this emissions unit under the following scenarios:
- i. During the day, only compliant materials are added;
  - ii. During the day, both compliant and noncompliant materials (solvents) are added and the resulting mixture is compliant; or
  - iii. During the day, only noncompliant solvents or a noncompliant mixture of materials (solvents, and paints) are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under Section C.1 of this permit.

## **B. Operational Restrictions**

1. The annual coating usage for this emissions unit shall not exceed 20,000 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The annual additional solvent usage in this emissions unit shall not exceed 4,100 gallons per rolling, 12-month period, as applied, excluding water and exempt solvent. The permittee has existing production records such that there is no need for first year monthly usage limitations.
2. The permittee shall cover the dip tank in order to reduce VOC emissions when not actively in use.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day:
  - a. The name and identification number of each material added to the dip tanks;
  - b. The VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tanks;
  - c. The number of gallons of each material added to the dip tanks, excluding water and exempt solvents;

Emissions Unit ID: **K001**

- d. On the days when a mixture of materials is added to the dip tanks, the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing (b x c) for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system]; and
  - e. On the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tanks and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of each tank containing solvent based coatings, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from each dip tank containing solvent based coatings in accordance with the procedures specified in Section E of this permit. The resulting VOC content shall be recorded.
2. The permittee shall collect and record the following information for each month for this emissions unit:
- a. The total gallons of coatings added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit;
  - b. The total gallons of additional solvent added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit;
  - c. The total gallons of coatings added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit, as a rolling, 12-month summation; and
  - d. The total gallons of additional solvent added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit, as a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for all HAP emitting emissions units at this facility:
- a. The name and identification number of each coating, additional solvent and cleanup material;
  - b. The individual Hazardous Air Pollutant (HAP)1 content each each coating, additional solvent and cleanup material in pounds of individual HAP per gallon of coating;
  - c. The total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of each coating, additional solvent and cleanup material, i.e., sum all the individual HAP contents from (b) for each each coating, additional solvent and

cleanup material;

- d. The number of gallons of each coating, additional solvent and cleanup material employed;
- e. The total individual HAP emissions from all coatings, additional solvents and cleanup materials employed, in tons per month and tons per rolling 12-month period, i.e., for each HAP, the sum of (b) times (d) for each coating, additional solvent and cleanup material divided by 2000; and
- f. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings, additional solvents and cleanup materials employed, in tons per month and tons per rolling, 12-month period, i.e., the sum of (c) times (d) for each coating for each coating, additional solvent and cleanup material divided by 2000.

A listing of the Hazardous Air Pollutants (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 cleanup materials. This information does not have to be kept on a line-by-line basis.

4. Each month, the permittee shall record the total VOC emissions from this emissions unit for the rolling 12-month period, i.e., the sum of C.1.b times C.1.c for each day during month and each coating, divided by 2000.

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

1. The permittee shall notify the Director (the Ohio EPA, Northeast District Office ) in writing of any daily record showing an exceedance of the VOC content limitation of 3.5 lbs VOC/gallon of coating as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northeast District Office ) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any deviations of the following:
  - a. 9.9 tons of individual HAP emissions from all the emissions units at this facility, in tons per rolling, 12-month period;
  - b. 24.9 tons of combined HAP emissions from all the emissions units at this facility, in tons per rolling, 12-month period; and

Emissions Unit ID: **K001**

- c. The maximum allowable cumulative coating and additional solvent usage limitations for this emissions unit.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall submit annual reports which identify :
- a. The total gallons of coating and the total gallons of additional solvent employed in this emissions unit, excluding water and exempt solvent; the total gallons of coating and the total gallons of additional solvent employed in this emissions unit, excluding water and exempt solvent;
  - b. The total VOC emissions from this emissions unit, in tons per year;
  - c. The total individual HAP emissions emitted at this facility; and
  - d. The total combined HAPs emissions emitted at this facility.

These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 of each year and shall include a statement of the corresponding emissions limitations in this permit.

## **E. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied and 3.5 lbs of VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvent (on the days when solvents are added to the dip tanks)

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C of the terms and conditions of this permit.

The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

$$\text{Daily volume-weighted average} = [\text{summation of } (G_i \times \text{VOC}_i)] / [\text{summation of } G_i] \text{ for } i = 1 \text{ to } n$$

where:

$i = 1, 2, 3, \dots n$

$n$  = the total number of the different types of materials added to the dip tank for that day;

$G_i$  = the number of gallons of material  $i$  (excluding water and exempt solvents) added to the dip tank for that day; and

$VOC_i$  = the VOC content of material  $i$ , in pounds/gallon of material, excluding water and exempt solvents .

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

- b. Emission Limitation:  
28.0 pounds per hour of VOC emissions

Applicable Compliance Method:

The short term emission limitation for VOC established above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

- c. Emission Limitation:  
40.0 tons VOC per rolling, 12-month period.

Applicable Compliance Method:

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

- d. Emission Limitation:  
9.9 tons of each individual HAP, based upon a rolling, 12-month summation for all emissions units at this facility.

Applicable Compliance Method:

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

- e. Emission Limitation:  
24.9 tons of each single HAP, based upon a rolling, 12-month summation for all emissions units at this facility.

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

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - West dip tank line and natural gas drying oven, to coat metal parts.	OAC rule 3745-31-05(A)(3)	See A.2.b below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(2)(c)	See A.2 a below.
	OAC rule 3745-35-07(B)	See A.2.c and A.2.d below

**2. Additional Terms and Conditions**

- 2.a The volatile organic compound (VOC) content shall not exceed 3.5 pounds per gallon of coating, as applied, excluding water and exempt solvent.
- 2.b VOC emissions from all coatings, and additional solvents shall not exceed 28.0 pounds per hour. The short term emission limitation for VOC established above reflects the emissions unit's potential to emit using 8 gallons per hour maximum application rate and 3.5 pounds per gallon maximum VOC content; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.c VOC emissions shall not exceed 40.0 tons per rolling, 12-month period from this emissions unit.
- 2.d Emissions of each individual HAP shall not exceed 9.9 tons per rolling, 12-month period

from all emissions units at this facility. Emissions of total, combined HAPs shall not exceed 24.9 tons per rolling, 12-month period from all emissions units at this facility.

- 2.e** The permittee adds VOC materials to the dip tanks associated with this emissions unit under the following scenarios:
- i. During the day, only compliant materials are added;
  - ii. During the day, both compliant and noncompliant materials (solvents) are added and the resulting mixture is compliant; or
  - iii. During the day, only noncompliant solvents or a noncompliant mixture of materials (solvents, and paints) are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under Section C.1 of this permit.

## **B. Operational Restrictions**

1. The annual coating usage for this emissions unit shall not exceed 20,000 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The annual additional solvent usage in this emissions unit shall not exceed 4,100 gallons per rolling, 12-month period, as applied, excluding water and exempt solvent. The permittee has existing production records such that there is no need for first year monthly usage limitations.
2. The permittee shall cover the dip tank in order to reduce VOC emissions when not actively in use.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day:
  - a. The name and identification number of each material added to the dip tanks;
  - b. The VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tanks;
  - c. The number of gallons of each material added to the dip tanks, excluding water and exempt solvents;

- d. On the days when a mixture of materials is added to the dip tanks, the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing (b x c) for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system]; and
  - e. On the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tanks and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of each tank containing solvent based coatings, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from each dip tank containing solvent based coatings in accordance with the procedures specified in Section E of this permit. The resulting VOC content shall be recorded.
2. The permittee shall collect and record the following information for each month for this emissions unit:
- a. The total gallons of coatings added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit;
  - b. The total gallons of additional solvent added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit;
  - c. The total gallons of coatings added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit, as a rolling, 12-month summation; and
  - d. The total gallons of additional solvent added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit, as a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for all HAP emitting emissions units at this facility:
- a. The name and identification number of each coating, additional solvent and cleanup material;
  - b. The individual Hazardous Air Pollutant (HAP)<sup>1</sup> content each each coating, additional solvent and cleanup material in pounds of individual HAP per gallon of coating;
  - c. The total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of each coating, additional solvent and cleanup material, i.e.,

Emissions Unit ID: **K002**

sum all the individual HAP contents from (b) for each each coating, additional solvent and cleanup material;

- d. The number of gallons of each coating, additional solvent and cleanup material employed;
- e. The total individual HAP emissions from all coatings, additional solvents and cleanup materials employed, in tons per month and tons per rolling 12-month period, i.e., for each HAP, the sum of (b) times (d) for each coating, additional solvent and cleanup material divided by 2000; and
- f. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings, additional solvents and cleanup materials employed, in tons per month and tons per rolling, 12-month period, i.e., the sum of (c) times (d) for each coating for each coating, additional solvent and cleanup material divided by 2000.

A listing of the Hazardous Air Pollutants (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 cleanup materials. This information does not have to be kept on a line-by-line basis.

4. Each month, the permittee shall record the total VOC emissions from this emissions unit for the rolling 12-month period, i.e., the sum of C.1.b times C.1.c for each day during month and each coating, divided by 2000.

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

1. The permittee shall notify the Director (the Ohio EPA, Northeast District Office ) in writing of any daily record showing an exceedance of the VOC content limitation of 3.5 lbs VOC/gallon of coating as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northeast District Office ) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any deviations of the following:
  - a. 9.9 tons of individual HAP emissions from all the emissions units at this facility, in tons per rolling, 12-month period;
  - b. 24.9 tons of combined HAP emissions from all the emissions units at this facility, in tons per rolling, 12-month period; and

- c. The maximum allowable cumulative coating and additional solvent usage limitations for this emissions unit.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall submit annual reports which identify :
- a. The total gallons of coating and the total gallons of additional solvent employed in this emissions unit, excluding water and exempt solvent; the total gallons of coating and the total gallons of additional solvent employed in this emissions unit, excluding water and exempt solvent;
  - b. The total VOC emissions from this emissions unit, in tons per year;
  - c. The total individual HAP emissions emitted at this facility; and
  - d. The total combined HAPs emissions emitted at this facility.

These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 of each year and shall include a statement of the corresponding emissions limitations in this permit.

## **E. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied and 3.5 lbs of VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvent (on the days when solvents are added to the dip tanks)

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C of the terms and conditions of this permit.

The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

$$\text{Daily volume-weighted average} = [\text{summation of } (G_i \times \text{VOC}_i)] / [\text{summation of } G_i] \text{ for } i = 1 \text{ to } n$$

where:

$i = 1, 2, 3, \dots n$

$n$  = the total number of the different types of materials added to the dip tank for that day;

$G_i$  = the number of gallons of material  $i$  (excluding water and exempt solvents) added to the dip tank for that day; and

$VOC_i$  = the VOC content of material  $i$ , in pounds/gallon of material, excluding water and exempt solvents .

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

- b. Emission Limitation:  
28.0 pounds per hour of VOC emissions

Applicable Compliance Method:

The short term emission limitation for VOC established above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

- c. Emission Limitation:  
40.0 tons VOC per rolling, 12-month period.

Applicable Compliance Method:

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

- d. Emission Limitation:  
9.9 tons of each individual HAP, based upon a rolling, 12-month summation for all emissions units at this facility.

Applicable Compliance Method:

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

- e. Emission Limitation:  
24.9 tons of each single HAP, based upon a rolling, 12-month summation for all emissions units at this facility.

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

**F. Miscellaneous Requirements**

None