State of Ohio Environmental Protection Agency

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

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22823
Fac ID: 0285020433
DATE: 1/15/2008

Mull Iron
Chet Mull
10 Mull Dr.
Rittman, OH 44270

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** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

FINAL PERMIT TO INSTALL 02-22823

Application Number:	02-22823
Facility ID:	0285020433
Permit Fee:	**$200**
Name of Facility:	Mull Iron
Person to Contact:	Chet Mull
Address:	10 Mull Dr. Rittman, OH 44270

Location of proposed air contaminant source(s) [emissions unit(s)]:
10 Mull Drive
Rittman, **Ohio**

Description of proposed emissions unit(s):
Modification to emissions unit K001 to allow for more paint usage.

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

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

Pollutant	Tons Per Year
VOC	10.8 TPY
single HAP	9.9 TPY
Combined HAP	10.8 TPY
PE	9.9 TPY

Emissions Unit ID: **K001**

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) - structural metal spray coating operation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	9.70 lbs/hr of volatile organic compounds (VOC) from all coatings and 10.8 tons per year VOC from all materials employed
OAC rule 3745-31-05(C)	See A.2.c and B.1 below.
OAC rule 3745-31-02(A)	9.9 tons per year of particulate emissions (PE) See A.2.g below.
OAC rule 3745-21-09(U)	See A.2.a below.
OAC rule 3745-17-08	See A.2.d below.
OAC rule 3745-17-07(B)	See A.2.e below.
OAC rule 3745-114	See A.2.f below.
40 CFR Part 63, Subpart HHHHHH	See A.2.b and D.5 below.

2. Additional Terms and Conditions

2.a The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

2.b On September 17, 2007, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH and Subpart A, General Provisions. When the NESHAP is promulgated, the facility will be subject as a new area source with a compliance date as specified in the NESHAP.

2.c Pursuant to OAC rule 3745-31-05(C), total emissions from emissions units K001 shall not exceed 9.9 tons per year of each single hazardous air pollutant (HAP), and 10.8 tons per year of combined HAP, based upon a rolling, 12-month summation. Single HAP content of each coating shall not exceed 3.22 pounds per gallon. Combined HAP content of each coating shall not exceed 3.5 pounds

per gallon. All cleanup material employed shall be considered as a single HAP.

2.d According to OAC rule 3745-17-08(A0(1) this emissions unit is not subject to fugitive particulate emissions limits because the facility is located in Wayne County.

2.e This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because Wayne County is not an Appendix A area.

2.f In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the director has establish, per ORC 3704.03(F)(4)(c), a limit for toluene, which shall not exceed 42 pounds per day, and a limit for xylene, which shall not exceed 84 pounds per day.

This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (24 hrs/day), by the emission rate modeled based upon an hourly coating usage of 2.77 gallons per hour (to determine the ground level concentration).

2.g Permit to Install 02-22823 for this air contaminant source takes into account the restricted annual coating usage, (i.e., 6,156 gallons), solids content, (i.e., 9.19 lbs solids/gallon coating), and solids transfer efficiency for electrostatic coating equipment, (i.e., 65%), as a voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 6,156 gallons, as a rolling, 12-month summation. The maximum annual clean-up material usage (dispensed minus recovered for disposal) for this emissions unit shall not exceed 20 gallons, as a rolling, 12-month summation. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

a. The name and identification number of each coating employed.

b. The VOC content (excluding water and exempt solvents) of each coating, in lbs/gal as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed].

e. The total number of hours this emissions unit was in operation.

f. The average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (e)].

g. The solids content of each coating.

h. The single HAP content of each coating, in lbs/gal, as applied.

i. The combined HAP content of each coating, in lbs/gal, as applied.

2. The permittee shall collect and record the following cleanup material information for each month for this emissions unit:

a. The company identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) times (c) for each cleanup material employed].

e. The amount of cleanup material recovered, in pounds.

f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e) times (c)].

g. The total annual cleanup material usage, in gallons, as a rolling, 12-month

summation [i.e., the sum of (b) for this month and the previous 11 months].

3. The permittee shall collect and record each month the total coating material usage, in gallons, as a rolling, 12-month summation [i.e., the sum of the daily records in (C.1.c) for this month and the previous 11 months].

4. The permittee shall calculate and record total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in Section C.1 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section C.2].

5. In order to verify that the emissions of toluene and xylene do not exceed the daily allowable, the permittee shall collect and record the following information each day for the coating line:

   a. The name and identification number of each coating employed.

   b. The toluene and xylene content (excluding water and exempt solvents) of each coating, in lbs/gal, as applied.

   c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

   d. The daily toluene and xylene emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed].

6. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 3.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8,824
MAGLC (ug/m3): 10,333

Pollutant: Toluene
TLV (mg/m3): 188.4
Maximum Hourly Emission Rate (lbs/hr): 1.75
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,412
MAGLC (ug/m3): 4,476

The permittee, having demonstrated that emissions of toluene and xylene, from emissions unit K001, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

7. Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

   b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and

   c. Physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

8. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

   a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

   b. The Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);

   c. A copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

   d. The documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

D. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Northeast District

Office) within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation reports that identify:

   a. Each day the VOC emissions exceeded the hourly emission limit specified above and the actual hourly VOC emissions during that day.

   b. Any exceedence of the rolling, 12-month coating and cleanup material usage limitation from emissions units K001 and the actual coating and cleanup material usage during the period.

   c. Any exceedance of the daily limitation on toxic air emissions, as established by the director in order to maintain any toxic air contaminant below its MAGLC.

   d. Any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrate compliance with the "Toxic Air Contaminant Statute".

   e. Any exceedance of the single HAP content limitation, and the actual single HAP content and number of gallons of the coating employed.

   f. Any exceedance of the combined HAP content limitation, and the actual combined HAP content and number of gallons of the coating employed.

   The quarterly deviation reports shall be submitted to the Director (the Northeast District Office) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual compliance reports that include:

   a. A list of all allowable emissions limits and operational restrictions in Section A.1 , A.2 and B.1; and

   b. A statement whether the emissions unit is in compliance with the requirements listed.

   The report shall be submitted to the Director (the Northeast District Office) by February 1 of each year and shall cover the previous calendar year.

4. The permittee shall submit annual reports that document any changes made to a

parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

5. Within 120 days after promulgation of 40 CFR Part 63, Subpart HHHHHH the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:

   a. The name and mailing address of the permittee;

   b. The physical location of the source if it is different from the mailing address;

   c. Identification of the relevant MACT standards and the permittee's compliance date; and

   d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant.

E. Testing Requirements

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

   a. Emissions Limitation:
   3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.1.

b. Emissions Limitation:
9.70 lbs/hr of VOC emissions, as a daily average

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.1.

c. Emissions Limitation:
10.8 TPY of VOC emissions

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.4.

d. Emissions Limitation:
9.9 TPY of each single HAPs

Applicable Compliance Method:
Compliance shall be determine according to the record keeping in C.1, C.2 and C.3 and the following equation:

[(CT) x (sHAP) + (CM)] x (ton/2000 lbs)

where:
CT is the actual gallons of coating employed per year, not to exceed 6,156;
sHAP is the actual single HAP content of the coatings, in pounds per gallon, not to exceed 3.22 lbs/gal; and
CM is the actual pounds of cleanup material employed, assumed to be 100% single HAP, the yearly summation from C.2.

e. Emissions Limitation:
10.8 TPY of combined HAPs

Applicable Compliance Method:
Compliance shall be determine according to the record keeping in C.1, C.2 and C.3 and the following equation:

[(CT) x (cHAP) + (CM)] x (ton/2000 lbs)

where:
CT is the actual gallons of coating employed per year, not to exceed 6,156;
cHAP is the actual combined HAP content of the coatings, in pounds per gallon, not to exceed 3.5 lbs/gal; and
CM is the actual pounds of cleanup material employed, assumed to be 100% HAP, the yearly summation from C.2.

f. Emissions Limitation:
9.9 TPY of PE

Applicable Compliance Method:
Compliance shall be determine according to the record keeping in C.1 and the following equation:

Summation of: (CT) x (S) x (1-65%) x (ton/2000 lbs)

where:
CT is the actual gallons of coating employed per year, not to exceed 6,156;
S is the actual solids content of the coatings, in pounds per gallon, not to exceed 9.19 lbs/gal; and
65% is the transfer efficiency of the electrostatic coating operation.

2. The permittee shall use USEPA Method 24, environmental data sheet or Environmental Data Sheet to determine the VOC, xylene, toluene and HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except A.2.e, C.5, C.6, C.7, C.8, C.9 and D.2.c.

2. Notes to permit writer concerning this permit:

   The maximum uncontrolled annual particulate emissions from this emissions unit would be approximately 56.3 tons; therefore, the permittee elected a voluntary annual allowable PE limitation of less than 10 tons PE/yr to avoid BAT.

3. This emissions unit will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH and Subpart A, General

Provisions. The proposed regulation may require the installation of spray booth filter or particulate controls. If the facility installs a spray booth or other ventilation system, the facility may model emissions of all regulated air toxic compounds. If the modeling results demonstrate that the concentration of air toxic compounds are less than 80% of the MAGLC, daily emission limitations for xylene and toluene in A.2.f, the requirements to calculated and record the actual emissions of xylene and toluene in C.5, the requirement to report exceedences of the limitations in D.2.c and the compliance demonstration in E.1.f shall be terminated.