



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/15/2012

Jeff Turner
Modern Welding Company
PO Box 4430
One Modern Way
Newark, OH 43058

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0145020338
Permit Number: P0009023
Permit Type: Renewal
County: Licking

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Modern Welding Company**

Facility ID:	0145020338
Permit Number:	P0009023
Permit Type:	Renewal
Issued:	3/15/2012
Effective:	3/15/2012
Expiration:	3/15/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Modern Welding Company

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Authorization

Facility ID: 0145020338
Application Number(s): A0014154
Permit Number: P0009023
Permit Description: FEPTIO Renewal permit for emissions units K001,K002 and P001
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/15/2012
Effective Date: 3/15/2012
Expiration Date: 3/15/2017
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Modern Welding Company
One Modern Way
Newark, OH 43056

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

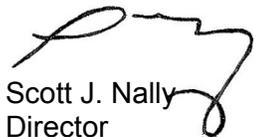
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0009023

Permit Description: FEPTIO Renewal permit for emissions units K001,K002 and P001

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Coating Room 1
Superseded Permit Number:	01-8003
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Coating Room 2
Superseded Permit Number:	01-8003
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Paint Mix Room
Superseded Permit Number:	01-8003
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K001, Coating Room 1

Operations, Property and/or Equipment Description:

Coating Room 1

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)4 through d)6 and e)(5)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2) a. thru d., c)(1), (2) & (3), d)(3) and e)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3) with VOC emissions limit of 16.1 pounds per hour, OAC rule 3745-31-05(D) with VOC emissions limit of 39.9 tons per year, and OAC rule 3745-21-09(U)(1) with emissions limitations specified by this rule.

(2) Additional Terms and Conditions

a. The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

- b. The total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation.
 - c. The total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.
 - d. The total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.
- c) Operational Restrictions
- (1) The maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period.
 - (2) The maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period.
 - (3) The maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
 - (4) The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.
 - (5) The VOC content of each clean up material employed in emissions units K001 and K002 shall not exceed 7.26 pounds of VOC per gallon of clean up material.
 - (6) The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed .87 pounds of VOC per gallon of resin coating.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following daily records for each surface coating employed in emission unit K001:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - d. The number of gallons of each coating material employed.
 - e. The total VOC emissions from all coatings, in pounds or tons.

- (2) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from emissions unit K001:
- a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.
- (3) The permittee shall collect and record the following information each month for each coating (resin and non resin) and cleanup material employed in emission units K001:
- a. The name and identification number of each coating, as applied;
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. The number of pounds 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 pound of cleanup material, as applied;
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. The number of pounds of each cleanup material employed. This value shall be calculated by subtracting the amount of recovered clean up material from the amount of clean up material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);

- k. The rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);
 - l. The rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);
 - m. The number of hours of operation; and
 - n. The rolling, 12-month volatile organic compound emissions summation for all coatings and all cleanup materials, in pounds or tons per year.
- (4) The PTI application for this/these emissions unit(s), K001, was evaluated based on the actual materials and the design parameters of the emissions unit(s)' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): .93

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 228

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Toxic Contaminant: Ethylbenzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): .95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 233

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10,333

Toxic Contaminant: xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 3.62

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 889

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Toxic Contaminant: styrene

TLV (mg/m³):213

Maximum Hourly Emission Rate (lbs/hr): 16.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 4,013

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):5071

Toxic Contaminant: methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 3.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 859

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):14048

Toxic Contaminant: methanol

TLV (mg/m³): 262

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):6,238

Toxic Contaminant: methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 1.63

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 401

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):4881

Toxic Contaminant: glycol ethers

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 2.04

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 501

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):2881

Toxic Contaminant: benzene

TLV (mg/m3): 32

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):762

Toxic Contaminant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 1.13

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 278

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):1,238

The permittee, has demonstrated that emissions of the individual toxic contaminant(s) modeled, pursuant to OAC 3745-114-01, from emissions unit(s) K001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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 rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final **PTIO** prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations. Additionally, the permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC content limits, VOC emission limits, coating usage limits (for all coatings and all cleanup materials employed in emission units K001, K002 and P001), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

- (3) The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations: VOC emissions from emissions unit K001 shall not exceed 16.1 pounds per hour and 39.9 tons per year. Total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section d) of these terms and conditions.

- b. Emission Limitations: Maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period, maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period and maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.

Applicable Compliance Method: Compliance with the usage limits in this permit shall be determined by the recordkeeping requirements in section d) of these terms and conditions.

- c. Emission Limitations: Total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation and total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.

Applicable Compliance Method: Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section d) of these terms and conditions.

- d. Emission Limitation: The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed .87 pounds of VOC per gallon of resin coating.

Applicable Compliance Method: Compliance with the .87 pound VOC/pound of styrene emission limit in this permit for each resin coating employed by K001 shall be calculated using an emission factor of .2 lb Styrene emitted/lb Styrene contained in the resin.

- e. Emission Limitation: The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Applicable Compliance Method: A. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

- g) Miscellaneous Requirements
 - (1) None.



2. K002, Coating Room 2

Operations, Property and/or Equipment Description:

Coating Room 2

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)4 through d)6 and e)(5)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2) a. thru d., c)(1), (2) & (3), d)(3) and e)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI# 01-8003	Volatile Organic Compound (VOC) emissions shall not exceed 16.1 pounds per hour.
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 39.9 tons per year. See b)(2)a.-d.
c.	OAC rule 3745-21-09(U)(1)	The emissions limitations specified by this rule is equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

- b. The total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation.
 - c. The total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.
 - d. The total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.
- c) Operational Restrictions
- (1) The maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period.
 - (2) The maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period.
 - (3) The maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
 - (4) The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.
 - (5) The VOC content of each clean up material employed in emissions units K001 and K002 shall not exceed 7.26 pounds of VOC per gallon of clean up material.
 - (6) The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed .87 pounds of VOC per gallon of resin coating.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following daily records for each surface coating employed in emission unit K002:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - d. The number of gallons of each coating material employed.
 - e. The total VOC emissions from all coatings, in pounds or tons.

- (2) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from emissions unit K002:
- a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.
- (3) The permittee shall collect and record the following information each month for each coating (resin and non resin) and cleanup material employed in emission units K002:
- a. The name and identification number of each coating, as applied;
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. The number of pounds 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 pound of cleanup material, as applied;
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. The number of pounds of each cleanup material employed. This value shall be calculated by subtracting the amount of recovered clean up material from the amount of clean up material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);

- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);
 - k. The rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);
 - l. The rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);
 - m. The number of hours of operation; and
 - n. The rolling, 12-month volatile organic compound emissions summation for all coatings and all cleanup materials, in pounds or tons per year.
- (4) The PTI application for this/these emissions unit(s), P001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.26

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 789

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Toxic Contaminant: Ethylbenzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 1.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 287

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10,333

Toxic Contaminant: xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 5.1

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 1232

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Toxic Contaminant: styrene

TLV (mg/m3):213

Maximum Hourly Emission Rate (lbs/hr): 16.4

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 3965

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):5071

Toxic Contaminant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.75

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 907

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):14048

Toxic Contaminant: methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 4

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):6,238

Toxic Contaminant: methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 1.63

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 395

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4881

Toxic Contaminant: glycol ethers

TLV (mg/m³): 121

Maximum Hourly Emission Rate (lbs/hr): 3.22

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 778

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):2881

Toxic Contaminant: benzene

TLV (mg/m³): 32

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):762

Toxic Contaminant: naphthalene

TLV (mg/m³): 52

Maximum Hourly Emission Rate (lbs/hr): 0.57

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 138

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):1,238

Toxic Contaminant:nitroethane

TLV (mg/m³): 307

Maximum Hourly Emission Rate (lbs/hr): .43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 103

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):7,310

Toxic Contaminant: methyl n-amyl ketone

TLV (mg/m³): 233

Maximum Hourly Emission Rate (lbs/hr): 3.76

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m³): 909

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):5,548

Toxic Contaminant:trimethylbenzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 2.49

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3):601

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):2,929

Toxic Contaminant:furfuryl alcohol

TLV (mg/m3): 40

Maximum Hourly Emission Rate (lbs/hr): .57

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3):137

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 952

Toxic Contaminant: butyl acetate

TLV (mg/m3):713

Maximum Hourly Emission Rate (lbs/hr): 2.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 661

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):16,976

Toxic Contaminant: VM and P naptha

TLV (mg/m3): 1,370

Maximum Hourly Emission Rate (lbs/hr): 8.74

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 2,113

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 32,619

Toxic Contaminant: ethyl alcohol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 5.34

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 1,292

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,762

Toxic Contaminant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): .85

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 206

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,405

Toxic Contaminant: propylene glycol monomethyl ether

TLV (mg/m3): 369

Maximum Hourly Emission Rate (lbs/hr): 4.28

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 1,034

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,786

Toxic Contaminant: butyl alcohol

TLV (mg/m3): 303

Maximum Hourly Emission Rate (lbs/hr): 2.74

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 662

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 7,214

Toxic Contaminant: diacetone alcohol

TLV (mg/m3): 238

Maximum Hourly Emission Rate (lbs/hr): .77

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 186

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5,667

Toxic Contaminant: butyl glycidyl ether

TLV (mg/m3): 133

Maximum Hourly Emission Rate (lbs/hr): .8

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 193

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3,167

Toxic Contaminant: ethylene glycol

TLV (mg/m3): 127

Maximum Hourly Emission Rate (lbs/hr): .32

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 78

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 1,566

Toxic Contaminant: hexyl acetate

TLV (mg/m3): 295

Maximum Hourly Emission Rate (lbs/hr): .95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 229

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 7,204

Toxic Contaminant: methyl n-propyl ketone

TLV (mg/m3): 705

Maximum Hourly Emission Rate (lbs/hr): .93

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 226

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,786

The permittee, has demonstrated that emissions of the individual toxic contaminant(s) modeled, pursuant to OAC 3745-114-01, from emissions unit(s) K001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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 rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final **PTIO** prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation. Additionally, the permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC content limits, VOC emission limits, coating usage limits (for all coatings and all cleanup materials employed in emission units K001, K002 and P001), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).
 - (3) The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitations: VOC emissions from emissions unit K002 shall not exceed 16.1 pounds per hour and 39.9 tons per year. Total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.
- Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section d) of these terms and conditions.
- b. Emission Limitations: Maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period, maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period and maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
- Applicable Compliance Method: Compliance with the usage limits in this permit shall be determined by the recordkeeping requirements in section d) of these terms and conditions.
- c. Emission Limitations: Total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation and total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.
- Applicable Compliance Method: Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section d) of these terms and conditions.
- d. Emission Limitation: The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed .87 pounds of VOC per gallon of resin coating.

Applicable Compliance Method: Compliance with the .87 pound VOC/pound of styrene emission limit in this permit for each resin coating employed by K002 shall be calculated using an emission factor of .2 lb Styrene emitted/lb Styrene contained in the resin.

- e. Emission Limitation: The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Applicable Compliance Method: A. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

g) Miscellaneous Requirements

- (1) None.



3. P001, Paint Mix Room

Operations, Property and/or Equipment Description:

Paint Mix Room

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)3 through d)5 and e)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2) a. thru d., c)(1), (2) & (3), d)(2) and e)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) PTI# 01-8003, Volatile Organic Compound (VOC) emissions shall not exceed 0.33 pound per hour. Row b: OAC rule 3745-31-05(D), VOC emissions shall not exceed 0.81 ton per year. See b)(2)a.-d.

(2) Additional Terms and Conditions

a. The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

b. The total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation.

- c. The total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.
 - d. The total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.
- c) Operational Restrictions
- (1) The maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period.
 - (2) The maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period.
 - (3) The maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from emissions unit P001:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.
 - (2) The permittee shall collect and record the following information each month for each coating (resin and non resin) and cleanup material employed in emission units P001:
 - a. The name and identification number of each coating, as applied;
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. The number of pounds 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 pound of cleanup material, as applied;
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. The number of pounds of each cleanup material employed. This value shall be calculated by subtracting the amount of recovered clean up material from the amount of clean up material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);
 - k. The rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);
 - l. The rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);
 - m. The number of hours of operation; and
 - n. The rolling, 12-month volatile organic compound emissions summation for all coatings and all cleanup materials, in pounds or tons per year.
- (3) The PTI application for this/these emissions unit(s), P001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic

compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): .93

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 228

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Toxic Contaminant: Ethylbenzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): .95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):233

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Toxic Contaminant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 3.62

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 889

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):10333

Toxic Contaminant: styrene

TLV (mg/m3):213

Maximum Hourly Emission Rate (lbs/hr): 16.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 4,013

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):5071

Toxic Contaminant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 859

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):14048

Toxic Contaminant: methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):6,238

Toxic Contaminant: methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 1.63

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 401

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4881

Toxic Contaminant: glycol ethers

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 2.04

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 501

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):2881

Toxic Contaminant: benzene

TLV (mg/m3): 32

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):762

Toxic Contaminant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 1.13

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 278

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):1,238

The permittee, has demonstrated that emissions of the individual toxic contaminant(s) modeled, pursuant to OAC 3745-114-01, from emissions unit(s) K001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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 rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final **PTIO** prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations. Additionally, the permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC emission limits, coating usage limits (for all coatings and all cleanup materials employed in emission units K001, K002 and P001), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: VOC emissions from emissions unit P001 shall not exceed 0.33 pound per hour and 0.81 ton per year. Total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section d) of these terms and conditions and shall be calculated using an emission factor of .02 lb VOC emitted/lb VOC mixed.

- b. Emission Limitations: Maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period, maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period and maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.

Applicable Compliance Method: Compliance with the usage limits in this permit shall be determined by the recordkeeping requirements in section d) of these terms and conditions.

- c. Emission Limitations: Total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation and total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.

Applicable Compliance Method: Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section d) of these terms and conditions.

- g) Miscellaneous Requirements

- (1) None.