☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **03-17038**

A. Source Description

This permit is for the installation of 10 metal cleaning operations (coil derailer cleaning stations) which will use solvent cleaning material and emit volatile organic compounds (VOC).

B. Facility Emissions and Attainment Status

The facility has requested synthetic minor limitations to avoid Title V applicability. The emissions of VOCs from the 10 metal cleaning operations combined shall not exceed 41.0 tons per year based on a rolling, 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on VOC material usage and content restrictions.

American Trim LLC PC3 is located in Auglaize County which is in attainment for all pollutants.

C. Source Emissions

Federally enforceable VOC limitations based on VOC material usage restrictions and a maximum coating VOC content of 8.00 pounds per gallon per year included in this permit will result in a limitation of 41.0 tons of VOC per year.

D. Conclusion

With the rolling, 12-month summation of the monthly emissions and VOC material usage and content restrictions the facility will not be applicable to the Title V program.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
AUGLAIZE COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 03-17038
Fac ID: 0306020054

DATE: 1/31/2006

American Trim LLC PC3
Kimberly Ness
1501 West Michigan Street
Sidney, OH 45365

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$2000** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO** **IN**

AUGLAIZE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17038** FOR AN AIR CONTAMINANT SOURCE FOR
American Trim LLC PC3

On 1/31/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **American Trim LLC PC3**, located at **413 East Krein Street, Wapakoneta**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17038:

Installation of 10 cleaning processes.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

DRAFT PERMIT TO INSTALL 03-17038

Application Number:	03-17038
Facility ID:	0306020054
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	American Trim LLC PC3
Person to Contact:	Kimberly Ness
Address:	1501 West Michigan Street Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:
413 East Krein Street
Wapakoneta, Ohio

Description of proposed emissions unit(s):
Installation of 10 cleaning processes.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized 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	41.0

Emissions Unit ID: **P005**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Coil derailer cleaning station #1	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon**.**
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period**.**
	OAC rule 3745-21-07(G)(2)	None (see Section B.2)**.**

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014**,** combined**,** to exceed 41.0 tons per rolling**,** 12-month period**,** based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **P006**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P006 - Coil derailer cleaning station #2	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	None (see Section B.2).

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014, combined, to exceed 41.0 tons per rolling, 12-month period, based on the following equation:

$$41.0 \text{ TPY} \geq \left[\sum^{n}(V_i)(G_i)\right] \div 2000 \text{ lbs/Ton} - \left[(Po)(VOCo) \div 2000 \text{ lbs/Ton}\right]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **P007**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P007 - Coil derailer cleaning station #3	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	None (see Section B.2).

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014, combined, to exceed 41.0 tons per rolling, 12-month period, based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P008 - Coil derailer cleaning station #4	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon**.**
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling**,** 12-month period.
	OAC rule 3745-21-07(G)(2)	None (see Section B.2)**.**

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014**,** combined**,** to exceed 41.0 tons per rolling**,** 12-month period**,** based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - Coil derailer cleaning station #5	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon**.**
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period**.**
	OAC rule 3745-21-07(G)(2)	None (see Section B.2)**.**

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014**,** combined**,** to exceed 41.0 tons per rolling**,** 12-month period**,** based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **P010**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P010 - Coil derailer cleaning station #6	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	None (see Section B.2).

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014, combined, to exceed 41.0 tons per rolling, 12-month period, based on the following equation:

$$41.0 \text{ TPY} \geq \left[\sum^{n}(V_i)(G_i)\right] \div 2000 \text{ lbs/Ton} - \left[(Po)(VOCo) \div 2000 \text{ lbs/Ton}\right]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P011 - Coil derailer cleaning station #7	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon**.**
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period**.**
	OAC rule 3745-21-07(G)(2)	None (see Section B.2)**.**

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014**,** combined**,** to exceed 41.0 tons per rolling**,** 12-month period**,** based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P012 - Coil derailer cleaning station #8	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon**.**
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period**.**
	OAC rule 3745-21-07(G)(2)	None (see Section B.2)**.**

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014**,** combined**,** to exceed 41.0 tons per rolling**,** 12-month period**,** based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P013 - Coil derailer cleaning station #9	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	None (see Section B.2).

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014, combined, to exceed 41.0 tons per rolling, 12-month period, based on the following equation:

n

$$41.0 \text{ TPY} \geq \left[\sum_{i=1}^{n}(V_i)(G_i)\right] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or

disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **P014**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P014 - Coil derailer cleaning station #10	OAC rule 3745-31-05 (A) (3)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.
	OAC rule 3745-31-05 (C)	The VOC emissions from emissions units P005 through P014 combined shall not exceed 41.0 tons per rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	None (see Section B.2).

2. Additional Terms and Conditions

2.a The requirements of OAC rule 3745-21-09(O) are not applicable to this emissions unit because the solvent metal cleaning operation is not considered a cold cleaner, an open top vapor degreaser, or a conveyorized degreaser, as defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The VOC in the raw materials usage shall not cause VOC emissions from emissions units P005 through P014, combined, to exceed 41.0 tons per rolling, 12-month period, based on the following equation:

$$41.0 \text{ TPY} \geq [\sum^{n}(V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}]$$

i=1

where

V_i = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: $V_i \leq 8.0$ lbs VOC/gallon;

G_i = gallons used of each cleaning solution for the rolling, 12-month period

n = total number of unique cleaning solutions employed in emissions units P005 through P014

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

2. The use of any photochemically reactive material in this emissions unit , as defined in OAC rule 3745-21-01, is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P005 through P014, combined:

   a. the company name or identification for each cleaning solution employed;

   b. documentation of whether or not each material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   c. the volume, in gallons, of each cleaning solution employed;

   d. the VOC content of each cleaning solution employed, in pounds per gallon; and

   e. the VOC emissions from the cleaning solutions employed, prior to any credit claimed for solvent recycling, in pounds, i.e., the summation of © x d) for all cleaning solutions.

2. If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;

e. the record of the total amount of VOC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the month;

f. the net VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [(c.1.e - c.2.e),divided by 2000 lbs/ton]; and

g. the rolling, 12-month VOC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying cleaning solution (i.e., for VOC content). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 41.0 tons (for emissions units P005 through P014, combined).

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

Compliance with the terms and conditions of this permit shall be demonstrated according to the following:

1. Emission Limitation:
   The VOC content of the cleaning solution shall not exceed 8.0 lbs VOC/gallon.

   Applicable Compliance Method:
   The record keeping requirements contained in Section C.1 of this permit shall be used to demonstrate compliance with the allowable VOC content limitation of 8.0 lbs/gallon. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.

2. Emission Limitation:
   The VOC emissions from emission units P005 through P014, combined, shall not exceed 41.0 tons per rolling, 12-month period.

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements established in Section C of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions from emission units P005 through P014 for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.