

Facility ID: 0303000098 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit L002](#)
- [Go to Part II for Emissions Unit N001](#)
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Facility ID: 0303000098 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001- Miscellaneous parts conveyor paint line with water curtain	OAC rule 3745-31-05(C) (PTI 03-16199, issued 12/14/06)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)
	OAC rule 3745-21-07	9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)
	OAC rule 3745-21-09	See A.2.b

2. Additional Terms and Conditions

- (a) This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See B.1).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00

- 1-9 7.11 18.00
- 1-10 7.90 20.00
- 1-11 8.69 22.00
- 1-12 9.50 24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07 (A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) / 2000 \text{ lbs/ton} \} - [(Po)(VOC_o) / 2000 \text{ lbs/ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

Po = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

$$\text{Month sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) 2000 \text{ lbs/ton} \} \leq$$

- 1 8.00
- 1-2 16.00
- 1-3 22.00
- 1-4 30.00
- 1-5 38.00
- 1-6 46.00
- 1-7 54.00
- 1-8 62.00
- 1-9 70.00
- 1-10 78.00
- 1-11 86.00
- 1-12 95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

- a. the company name or identification for each coating/cleanup material employed;
- b. the volume, in gallons, of each coating/cleanup material employed;
- c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
- d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

2. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, 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 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 rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any 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; and
- e. the record of the total amount of VOC emissions (lbs or tons) 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 rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
 - a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;
 - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.
 - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.
 - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:
95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.3.
2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. None

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Facility ID: 0303000098 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002- Primer spray and dip spray station	OAC rule 3745-31-05(A)(3) (PTI 03-16199, issued 12/14/06)	41.0 pounds Volatile Organic Compounds (VOC)/day and 7.5 tons VOC/yr
	OAC rule 3745-31-05(C)	See section A.2.a. 95.00 tons VOC per rolling, 12-month period for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
	OAC rule 3745-21-09(U)(2)(e)(iii)	9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b) VOC emission exemption, based on maximum coating usage never exceeding 10 gallons in any one day

2. Additional Terms and Conditions

- (a) The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U)(2)(e)(iii). This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See B.1).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) / 2000 \text{ lbs/ton} \} - [(Po)(VOC_o) / 2000 \text{ lbs/ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, K003, L002,

R001 and R005

Po = total gallons of recovered solvents
 VOCo = VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month $\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (Vi Gi) 2000 \text{ lbs/ton} \} \leq$

1 8.00
 1-2 16.00
 1-3 22.00
 1-4 30.00
 1-5 38.00
 1-6 46.00
 1-7 54.00
 1-8 62.00
 1-9 70.00
 1-10 78.00
 1-11 86.00
 1-12 95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain daily records of the following information for emissions unit K002:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon, as applied;
 - c. the number of gallons, of each coating employed;
 - d. the total volume, in gallons, of all coatings employed;
 - e. the total VOC emissions from all coatings employed, in pounds per day, (summation of C.1.b x C.1.c for all coatings employed);
 - f. the annual year to date VOC emissions from all coatings employed, in tons per year, (summation of C.1.d for each calendar month to date from January to December);
2. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;
 - b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, 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 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 rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any 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; and
 - e. the record of the total amount of VOC emissions (lbs or tons) 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 rolling 12 month period.
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
 - a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

- c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings/cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.4.e for all HAPs for all coatings/cleanup materials), in lbs;
 - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.
 - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.
 - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports that summarize the total annual actual VOC emissions from coating operations for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation
41.0 lbs VOC/day, 7.5 tons VOC/yr

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.1.

Emission Limitation
VOC emission exemption, based on maximum coating usage never exceeding 10 gallons in any one day

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.1.

Emission Limitation:
95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.

Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.4.
2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. None

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Facility ID: 0303000098 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003- Full size paint booth	OAC rule 3745-31-05(A)(3) (PTI 03-16199, issued 12/14/06)	16.2 pounds Organic Compounds (OC)/day and 7.3 tons OC/yr See section A.2.a.
	OAC rule 3745-31-05(C) (PTI 03-16199, issued 12/14/06)	95.00 tons VOC per rolling, 12-month period for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
	OAC rule 3745-21-09(U)(2)(c)	9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b) VOC emission exemption based on the repainting (refinishing) of used motor vehicles

2. Additional Terms and Conditions

- (a) The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U)(2)(c). This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See B.1).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) / 2000 \text{ lbs/ton} \} - [(P_o)(VOC_o) / 2000 \text{ lbs/ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

Vi = VOC content in pounds per gallon of each coating/cleanup employed;

Gi = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

Po = total gallons of recovered solvents

VOCo = VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month sum[M=1,12] {sum[i=1,n] (Vi Gi) 2000 lbs/ton} <=

1 8.00

1-2 16.00

1-3 22.00

1-4 30.00

1-5 38.00

1-6 46.00

1-7 54.00

1-8 62.00

1-9 70.00

1-10 78.00

1-11 86.00

1-12 95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for emissions unit K003:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, in pounds per gallon, as applied;
 - c. the number of gallons, of each coating employed;
 - d. the total volume, in gallons, of all coatings employed;
 - e. the total OC emissions from all coatings employed, in pounds per day, (summation of C.1.b x C.1.c for all coatings employed);
 - f. the annual year to date OC emissions from all coatings employed, in tons per year, (summation of C.1.d for each calendar month to date from January to December);
2. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;
 - b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, 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 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 rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any 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; and
 - e. the record of the total amount of VOC emissions (lbs or tons) 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 rolling 12 month period.
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002,

K003, L002, R001, and R005 combined:

- a. the company identification of each coating/cleanup material employed;
- b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating/cleanup material employed;
- d. the emission rate for each individual HAP from each coating/cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings/cleanup materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.4.e for all HAPs for all coatings/cleanup materials), in lbs;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.
 - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.
 - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that summarize the total annual actual OC emissions from coating operations for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports that summarize the total annual actual VOC emissions from coating operations for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation
16.2 lbs OC/hr and 7.3 tons OC/yr

Applicable Compliance Method
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2.0 gallons per hour) by the maximum OC content of all the coatings (8.1 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

Compliance with the annual allowable OC emission limitation shall be based on the record keeping requirements as specified in C.1.
Emission Limitation:
95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.
Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.4.
2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the

emissions unit's maximum annual emissions 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 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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0303000098 Emissions Unit ID: L002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 gallon isopropyl alcohol cold cleaner station	OAC rule 3745-31-05(A)(3) (PTI 03-16199, issued 12/14/06)	50.4 pounds Volatile Organic Compounds (VOC)/day and 9.2 tons VOC/yr
		See section A.2.a
	OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
		9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
	OAC rule 3745-21-09(O)(2)	See A.2.d
	OAC rule 3745-21-09(O)(2)	See A.2.c

2. Additional Terms and Conditions

- (a) The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (O)(2). This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See B.1).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00

- 1-8 6.32 16.00
- 1-9 7.11 18.00
- 1-10 7.90 20.00
- 1-11 8.69 22.00
- 1-12 9.50 24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

In accordance with OAC rule 3745-21-09(O)(2), each owner or operator of a cold cleaner shall:

- i. equip the cold cleaner with either:
 - a. a cover- if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at 100 degrees Fahrenheit or the solvent is heated or agitated, the cover shall be signed and constructed so that it can be easily operated with one hand; or
 - b. a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided a sink-like work area has an open drain area of less than 16 square inches and provided the solvent is neither heated above 120 degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit;
 - ii. equip the cold cleaner with a device for draining the cleaned parts-if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system;
 - iii. install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at 100 degrees Fahrenheit, or if the solvent is heated above 120 degrees Fahrenheit;
 - a. freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - b. water cover (solvent must be insoluble in and heavier than water); or
 - c. other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Director; and
 - iv. operate and maintain the cold cleaner in a manner which is consistent with good engineering.

B. Operational Restrictions

- 1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) / 2000 \text{ lbs/ton} \} - [(P_o)(VOC_o) / 2000 \text{ lbs/ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

$$\text{Month sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) 2000 \text{ lbs/ton} \} \leq$$

- 1 8.00
- 1-2 16.00
- 1-3 22.00
- 1-4 30.00
- 1-5 38.00
- 1-6 46.00
- 1-7 54.00
- 1-8 62.00
- 1-9 70.00
- 1-10 78.00
- 1-11 86.00
- 1-12 95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

- 2. Emissions unit L002 shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - b. store waste solvent in covered containers;
 - c. close the cover whenever parts are not being handled in the cleaner;

- d. drain the cleaned parts until dripping ceases;
 - e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge; and,
 - f. clean only materials that are neither porous nor absorbent.
- 3. Emissions unit L002 shall be equipped with a device for draining the cleaned parts; and the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

C. Monitoring and/or Record Keeping Requirements

- 1. 1. The permittee shall maintain daily records of the following information for emissions unit L002:
 - a. the types of solvents employed in the cold cleaner;
 - b. the vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit;
 - c. the number of gallons, excluding water and exempt solvents, of each cleaning solvent used;
 - d. the volatile organic compound emission rate for each solvent in pounds/day; and,
 - e. the annual year to date VOC emissions from all solvents material usage (the summation of C.1.d).
- 2. 2. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;
 - b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- 3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, 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 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 rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any 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; and
 - e. the record of the total amount of VOC emissions (lbs or tons) 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 rolling 12 month period.
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- 4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
 - a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.4.e for all HAPs for all coatings/cleanup materials), in lbs;
 - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

5. The permit to install for emission unit L002 was evaluated based on the actual materials (coatings, cleanup materials and decreasing materials-specified by the permittee in PTI 03-0783 issued final on December 21, 1998) and the design parameters of the exhaust system for the emission units, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 2.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 2.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

TLV (mg/m3): 983,000
 Maximum Hourly Emission Rate (lbs/hr): 1.32
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 5,371
 MAGLC (ug/m3): 23,404

6. Physical changes to or changes in the method of operation of the emission unit(s) after installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emission unit(s) or exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.
 - For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.
 - Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).
 - for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).
- The permittee shall submit annual reports that summarize the total annual actual VOC emissions from all solvents material usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

- Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 Emission Limitation:
 50.4 pounds of VOC per day and 9.2 tons of VOC per year

 Applicable Compliance Method:
 Compliance with the annual allowable VOC emission above shall be based upon the recordkeeping requirements specified in section C.1 of this permit.

Emission Limitation:
95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.

Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.4.

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0303000098 Emissions Unit ID: N001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
N001- Natural gas-fired brake shoe burn-off oven with afterburner	OAC rule 3745-31-05(A)(3) (PTI 03-16152, issued 7/22/04)	0.02 lbs of particulate emissions (PE)/hour; 0.09 tons of PE/year 0.02 lb of organic compound (OC)/hr, 0.09 ton of OC/year Opacity Restrictions (see A.2.a) Control Requirements (see A.2.b)
	OAC rule 3745-17-07(A)	See A.2.c
	OAC rule 3745-17-09(B)	See A.2.c
	OAC rule 3745-21-08(B)	See A.2.d

2. Additional Terms and Conditions

- (a) Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of natural gas and afterburner. BAT requirements also include compliance with the terms and conditions of this permit. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). "Best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved

SIP for Ohio.

B. Operational Restrictions

1. The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit
2. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
 - a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1500 degrees Fahrenheit, taking into account normal start-up procedures.
 - b. the secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1500 degrees Fahrenheit, taking into account normal start-up procedures.
3. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:
 - a. the permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
 - b. prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle;
 - c. the permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
 - d. Emissions unit N001 shall only be used for the purpose of removing non-hazardous material (such as paint, oil, plastic, grease, etc) from reusable metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
2. The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:
 - a. the dates the emissions unit was operated
 - b. the number of batches processed for each date the emissions unit was operated; and
 - c. the dates and descriptions of any additional maintenance activities performed on this emissions unit.

D. Reporting Requirements

1. 1. The permittee shall submit deviation (excursion) reports in which provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:
 - a. the date of the excursion;
 - b. the temperature values during the excursion;
 - c. the cause(s) for the excursion; and
 - d. the corrective action which has been or will be taken to prevent similar excursions in the future.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation
0.02 lbs of PE/hr

Applicable Compliance Method
The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

Emission Limitation
0.09 tons of PE/year

Applicable Compliance Method
The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation
0.02 lb OC/hr

Applicable Compliance Method
The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1- 4, 18, 25, or 25A of 40 CFR Part 60, Appendix A.

Emission Limitation
0.09 ton of OC/year

Applicable Compliance Method

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.

Applicable Compliance Method

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0303000098 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001- Detail parts paint booth with waterwash (L2-DPB)	OAC rule 3745-31-05(C) (PTI 03-16199, issued 12/14/06)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)
	OAC rule 3745-21-07	9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)
	OAC rule 3745-21-09	See A.2.b

2. Additional Terms and Conditions

- (a) This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See B.1).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00

- 1-2 1.58 4.00
- 1-3 2.37 6.00
- 1-4 3.16 8.00
- 1-5 3.95 10.00
- 1-6 4.74 12.00
- 1-7 5.53 14.00
- 1-8 6.32 16.00
- 1-9 7.11 18.00
- 1-10 7.90 20.00
- 1-11 8.69 22.00
- 1-12 9.50 24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07 (A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) / 2000 \text{ lbs/ton} \} - [(P_o)(VOC_o) / 2000 \text{ lbs/ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

- Month sum[M=1,12] {sum[i=1,n](V_i G_i) 2000 lbs/ton} <=
- 1 8.00
- 1-2 16.00
- 1-3 22.00
- 1-4 30.00
- 1-5 38.00
- 1-6 46.00
- 1-7 54.00
- 1-8 62.00
- 1-9 70.00
- 1-10 78.00
- 1-11 86.00
- 1-12 95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

- a. the company name or identification for each coating/cleanup material employed;
- b. the volume, in gallons, of each coating/cleanup material employed;
- c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
- d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

2. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, 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 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 rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any 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; and
 - e. the record of the total amount of VOC emissions (lbs or tons) 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 rolling 12 month period.
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;
 - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.
 - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.
 - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
- Emission Limitation:
95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage
- Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.
- Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined
- Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.3.
2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0303000098 Emissions Unit ID: R005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R005- Miscellaneous detailed parts paint spray booth	OAC rule 3745-31-05(C) (PTI 03-16199, issued 12/14/06)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)
	OAC rule 3745-21-07	9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)
	OAC rule 3745-21-09	See A.2.b

2. Additional Terms and Conditions

- (a) This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See B.1).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07 (A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) / 2000 \text{ lbs/ton} \} - [(Po)(VOC_o) / 2000 \text{ lbs/ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

Po = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

$$\text{Month sum}[M=1,12] \{ \text{sum}[i=1,n] (V_i G_i) 2000 \text{ lbs/ton} \} \leq$$

1 8.00

1-2 16.00

1-3 22.00

1-4 30.00

1-5 38.00

1-6 46.00

1-7 54.00

1-8 62.00

1-9 70.00

1-10 78.00

1-11 86.00

1-12 95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;
 - b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
2. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, 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 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 rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any 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; and
 - e. the record of the total amount of VOC emissions (lbs or tons) 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 rolling 12 month period.
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
 - a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each

individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;

g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

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

a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:

95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

Emission Limitation

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements as specified in C.3.

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. None