

Facility ID: 0306020025 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.

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

Facility ID: 0306020025 Emissions Unit ID: K004 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>
Screen printing operation including: 4 screen printing machines, 2 roll coaters, and 7 natural gas ovens (Clean Room #3)	OAC rule 3745-31-05 (A)(3) (PTI 03-10257 as modified on December 14, 2006)	Organic Compounds (OC): Base Coat: 1.53 pounds OC/hour; 6.71 tons OC/year  Top Coat: 1.72 pounds OC/hour; 7.53 tons OC/year  Graphic Ink: 0.07 pounds OC/hour; 0.31 tons OC/year
	OAC rule 21-09 (U)(2)(f)	Cleanup: 986 pounds OC/month; 6.00 tons OC/year Volatile Organic Compounds (VOC): Base Coat: 4.64 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied  Top Coat: 4.92 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied  Graphic Ink: 3.43 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied
	OAC rule 3745-31-05(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 K003, K004, and K005, combined (See A.I.2.b)

**2. Additional Terms and Conditions**

- (a) The permittee has requested federally enforceable limitations of 9.5 tons of any individual Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act, and 24.0 tons of combined HAPs per rolling, 12-month period for emissions units K003, K004, and K005, combined, for the purposes of avoiding the requirements of 40 CFR Part 63, Subpart M and OAC rule 77 (CAAA Title V permits).

To ensure federal enforceability during the first 12 calendar months of operation, 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	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60

1-9 7.43 18.68  
 1-10 8.25 20.75  
 1-11 9.08 22.83  
 1-12 9.5 24.0

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates for emissions units K003, K004, and K005, combined.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for this emissions unit (for base coats):
  - a. the name and identification number of each coating employed;
  - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2].
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - e. the total OC emissions from each coating employed, in pounds or tons per month [(c) x (d)];
  - f. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (e)]; and
  - g. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (f)].
2. The permittee shall collect and record the following information each month for this emissions unit (for top coats):
  - a. the name and identification number of each coating employed;
  - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2].
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - e. the total OC emissions from each coating employed, in pounds or tons per month [(c) x (d)];
  - f. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (e)]; and
  - g. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (f)].
3. The permittee shall collect and record the following information each month for this emissions unit (for graphic inks):
  - a. the name and identification number of each coating employed;
  - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2].
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - e. the total OC emissions from each coating employed, in pounds or tons per month [(c) x (d)];
  - f. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (e)]; and
  - g. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (f)].
4. The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the OC content of each cleanup material, as applied, in lbs/gal;
  - d. the OC emissions from each cleanup material employed, in lbs, (b x c); and
  - e. the total OC emissions from all cleanup materials, in lbs, (sum of d).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if

waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density.

5. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K003, K004, and K005, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate, in pounds, for each HAP from each coating and cleanup material employed [(b) x (c)];
  - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of (d) for each HAP], in pounds per month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of (e)], in pounds per month;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

6. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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):

Pollutant: 2-ethoxy-ethanol  
 TLV (ug/m3): 18,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.15  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 387  
 MAGLC (ug/m3): 429

(worst-case organic constituent)

7. Physical changes to or changes in the method of operation of the emissions unit after its 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 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:
  - a. changes in the composition of the materials used (mold release agent), 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;
  - b. changes in the compositions 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
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
8. 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.
9. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. 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**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) 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 monthly cleanup OC limit of 986 pounds.  
  
These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for: base coating; top coating; and graphic ink usage; for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP limitation of 9.5 tons and/or the combined HAPs emission limitation of 24.0 tons (for emissions units K003, K004, and K005, 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.I of the terms and conditions of this permit shall be determined in accordance with the following methods:  
Emission Limitation:  
Base Coat: 1.53 pounds OC/hour  
  
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 (0.33 gallons per hour) by the maximum OC content of all the coatings (4.64 pounds per gallon).  
Emission Limitation:  
Top Coat: 1.72 pounds OC/hour  
  
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 (0.35 gallons per hour) by the maximum OC content of all the coatings (4.92 pounds per gallon).  
Emission Limitation:  
Graphic Ink: 0.07 pounds OC/hour  
  
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 (0.02 gallons per hour) by the maximum OC content of all the coatings (3.43 pounds per gallon).  
Emission Limitation:  
Cleanup: 986 pounds OC/month; 6.00 tons OC/year  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in C.4.  
  
The annual allowable OC limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is shown, compliance with the annual limitation shall be assumed.  
Emission Limitation:  
Base Coat: 4.64 pounds VOC per gallon  
Top Coat: 4.92 pounds VOC per gallon  
Graphic Ink: 3.43 pounds VOC per gallon  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in C.1.b, C.2.b, and C.3.b, respectively.  
Emission Limitation:  
Base Coat: 6.71 tons OC/year  
Top Coat: 7.53 tons OC/year  
Graphic Ink: 0.31 tons OC/year  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in C.1, C.2, and C.3, respectively.  
Emission Limitation:  
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 K003, K004, and K005, combined  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in C.5.
  2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.
- F. Miscellaneous Requirements**
1. None

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

Facility ID: 0306020025 Emissions Unit ID: K005 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>
Screen printing operation including: 1 five station ultra-violet screen printing processor, 2 roll coaters, and 7 natural gas ovens (Clean Room #2)	OAC rule 3745-31-05 (A)(3)(PTI 03-10257 as modified on December 14, 2006)	Organic Compounds (OC): Base Coat: 1.96 pounds OC/hour; 8.58 tons OC/year  Top Coat: 1.96 pounds OC/hour; 8.58 tons OC/year
	OAC rule 21-09 (U)(1)(i)	Cleanup: 986 pounds OC/month; 6.00 tons OC/year Volatile Organic Compounds (VOC): Base Coat: 3.00 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied  Top Coat: 3.00 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied
	OAC rule 3745-31-05(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 K003, K004, and K005, combined (See A.1.2.b)

**2. Additional Terms and Conditions**

- (a) The permittee has requested federally enforceable limitations of 9.5 tons of any individual Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act, and 24.0 tons of combined HAPs per rolling, 12-month period for emissions units K003, K004, and K005, combined, for the purposes of avoiding the requirements of 40 CFR Part 63, Subpart M and OAC rule 77 (CAAA Title V permits).

To ensure federal enforceability during the first 12 calendar months of operation, 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	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.5	24.0

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates for emissions units K003, K004, and K005, combined.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for this emissions unit (for base coats):

- a. the name and identification number of each coating employed;
  - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2].
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - e. the total OC emissions from each coating employed, in pounds or tons per month [(c) x (d)];
  - f. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (e)]; and
  - g. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (f)].
2. The permittee shall collect and record the following information each month for this emissions unit (for top coats):
  - a. the name and identification number of each coating employed;
  - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2].
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - e. the total OC emissions from each coating employed, in pounds or tons per month [(c) x (d)];
  - f. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (e)]; and
  - g. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (f)].
3. The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the OC content of each cleanup material, as applied, in lbs/gal;
  - d. the OC emissions from each cleanup material employed, in lbs, (b x c); and
  - e. the total OC emissions from all cleanup materials, in lbs, (sum of d).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density.
4. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K003, K004, and K005, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate, in pounds, for each HAP from each coating and cleanup material employed [(b) x (c)];
  - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of (d) for each HAP], in pounds per month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of (e)], in pounds per month;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.
5. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0

model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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):

Pollutant: 2-ethoxy-ethanol  
 TLV (ug/m3): 18,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.15  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 387  
 MAGLC (ug/m3): 429

(worst-case organic constituent)

6. Physical changes to or changes in the method of operation of the emissions unit after its 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 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:

a. changes in the composition of the materials used (mold release agent), 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;

b. changes in the compositions 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

c. physical changes to the emissions unit or its 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.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. 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**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) 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 monthly cleanup OC limit of 986 pounds.

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

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for: base coating; and top coating; for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP limitation of 9.5 tons and/or the combined HAPs emission limitation of 24.0 tons (for emissions units K003, K004, and K005, 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.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:  
 Base Coat: 1.96 pounds OC/hour

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 (0.98 pounds per gallon).

Emission Limitation:  
 Top Coat: 1.96 pounds OC/hour

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 (1.0 gallons per hour) by the maximum

OC content of all the coatings (1.96 pounds per gallon).

Emission Limitation:

Cleanup: 986 pounds OC/month; 6.00 tons OC/year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.4.

The annual allowable OC limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is shown, compliance with the annual limitation shall be assumed.

Emission Limitation:

Base Coat: 3.00 pounds VOC per gallon

Top Coat: 3.00 pounds VOC per gallon

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.1.b, and C.2.b, respectively.

Emission Limitation:

Base Coat: 8.58 tons OC/year

Top Coat: 8.58 tons OC/year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.1, and C.2, respectively.

Emission Limitation:

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 K003, K004, and K005, combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.5.

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.

F. **Miscellaneous Requirements**

1. None