

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

Permit To Install: **03-17226**

**A. Source Description**

The Mayflower Vehicle Systems, Norwalk, Ohio, facility is a supplier of complete truck cabs for the commercial vehicle sector. The truck cab operations consist of a dip tank e-coating line, a primer repair line, a sealing line, and cleanup operations.

**B. Facility Emissions and Attainment Status**

Current facility potential emissions exceed the Title V and MACT applicability thresholds of 100 tons per year of VOC, 10 tons per year of a single HAP and 25 tons per year of combined HAPs. The facility will voluntarily restrict all VOC emissions from the facility to below 50.0 tons per year and less than 9.5 tons per year of any individual HAP and less than 24.0 tons per year of any combination of HAPs. The facility is located in Huron County, which is in attainment for all criteria pollutants. The Mayflower Vehicle Systems, Norwalk, Ohio facility is not a major facility for new source review and also the permittee's proposal does not constitute an increase in emissions. The facility is located in Huron County, which is in attainment for all criteria pollutants.

**C. Source Emissions**

The Mayflower Vehicle Systems, Norwalk, Ohio facility has four emission units that emit VOC and HAP emissions. For purposes of this permit action the facility emissions and the source emissions are the same, see Facility Emissions above for details.

**D. Conclusion**

Several emissions units have been permanently removed from the facility and they are now able to purpose synthetic minor emission limitations which will establish the facility as a minor source for Title V and MACT purposes.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
HURON COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 03-17226**

**Fac ID: 0339020133**

**DATE: 11/14/2006**

Mayflower Vehicle Systems, Inc.  
Lee Winer  
55 North Garfield  
Norwalk, OH 44857

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NWDO

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**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17226 FOR AN AIR CONTAMINANT SOURCE FOR  
Mayflower Vehicle Systems, Inc.**

On 11/14/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mayflower Vehicle Systems, Inc.**, located at **55 North Garfield Street, Norwalk, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17226:

**Synthetic minor PTI to opt out of TV, NESHAP?MACT and NSPS.**

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

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



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 03-17226**

Application Number: 03-17226  
Facility ID: 0339020133  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Mayflower Vehicle Systems, Inc.  
Person to Contact: Lee Winer  
Address: 55 North Garfield  
Norwalk, OH 44857

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**55 North Garfield Street  
Norwalk, Ohio**

Description of proposed emissions unit(s):  
**Synthetic minor PTI to opt out of TV, NESHAP?MACT and NSPS.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Mayflower Vehicle Systems, Inc.  
PTI Application: 03-17226  
Issued: To be entered upon final issuance  
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0339020133

## **A. Permit to Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Records Retention Requirements**

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

### **4. Inspections and Information Requests**

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

**Mayflower Vehicle Systems, Inc.**

**Facility ID: 0339020133**

**PTI Application: 03-17226**

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	50
Individual HAPs	9.50
Combined HAPs	24.00

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K003) - Electrodeposition Coating line and associated curing oven (modification of PTI #03-8762, issued on 5/3/1995, to establish synthetic minor VOC & HAP limitations).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	22.25 pounds Volatile Organic Compounds (VOC)/hr  See Section A.2.a
OAC rule 3745-31-05(C)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801 combined (see section A.2.b)  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, K016, K017 and P801 combined (see section A.2.b)
OAC rule 3745-21-09(U)(1)(i)	3.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09] (See A.2.d)

**2. Additional Terms and Conditions**

- 2.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)(1)(i).
- 2.b 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. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801 combined (See B.1).

Emissions Unit ID: **K003**

- ii. Annual HAP emissions from emissions units K003, K016, K017 and P801 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):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
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.

- 2.c** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- 2.d** The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(d) applies to the coating in the dip tank. The VOC content restriction also applies to the addition of make-up material to the dip tank (See C.2)

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials containing VOC (coatings,

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thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801 combined, is limited by the following equation:

$$\sum_{i=1}^n \sum_{M=1}^{12} [V_i G_i] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

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

V<sub>i</sub> = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

G<sub>i</sub> = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emissions units K003, K016, K017 and P801 combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n \sum_{M=1}^{12} [V_i G_i] \div 2000$ is less than or equal to
1	10.00
1-2	13.64
1-3	17.28
1-4	20.92
1-5	24.56
1-6	28.20
1-7	31.84

Emissions Unit ID: **K003**

1-8	35.48
1-9	39.12
1-10	42.76
1-11	46.40
1-12	50.00

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

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K003:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of the coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];
2. The permittee shall collect and record the following information for each addition of make-up material(s) (such as coating, solvent, coating additives, etc.) to the dip tank:
  - a. the VOC content excluding water and exempt solvents of the make-up material added or if more than one material is added at one time, the VOC content excluding water and exempt solvents of the resulting mixture of the materials added to the dip tank. [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];
  - b. if make-up materials are added to the dip tank on a continuous basis, the permittee shall calculate the VOC content excluding water and exempt solvents of the resulting mixture of the materials added to the dip tank once per day for all make-up materials added during the given day.
2. The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801 combined:
  - a. the company name or identification for each VOC containing material employed;

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- b. the volume, in gallons, of each VOC containing material employed;
  - c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the rolling 12-month summation of VOC emissions from the VOC containing 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 K003, K016, K017 and P801 combined:

- a. the company identification of each HAP containing material employed;
- b. the amount of each individual HAP in each HAP containing material, in lbs/gallon, as applied;
- c. the number of gallons of each HAP containing material employed;
- d. the emission rate for each individual HAP from each HAP containing 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 HAP containing materials employed (for each individual HAP, the summation of C.3.d for all HAP containing materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the HAP containing materials employed (summation of C.3.e for all HAPs for all HAP containing 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 50.00 tons (for emissions units K003, K016, K017 and P801 combined).
  - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC containing material usage rates specified in section B.1.

Emissions Unit ID: **K003**

- 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 K003, K016, K017 and P801 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 K003, K016, K017 and P801 combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. 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 material (i.e. coatings and dip tank make-up additions, See A.2.d) 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.

## **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:

- a. Emission Limitation  
22.25 lbs VOC/hr

### 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 (7.42 gallons per hour) by the maximum allowable OC content of the coating (3.0 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.

- b. Emission Limitation: 50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801 combined

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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.

c. 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 K003, K016, K017 and P801 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.

**Mayflower Vehicle Systems, Inc.**  
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**Facility ID: 0339020133**

**Emissions Unit ID: K003**

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K016) - Primer repair operation (modification of PTI #03-8762, issued on 5/3/1995, to separate primer operations previously permitted as part of K003 and to establish synthetic minor VOC & HAP limitations)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	6.23 pounds Volatile Organic Compounds (VOC)/hr  See Section A.2.a
OAC rule 3745-31-05(C)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, and K017 combined (see section A.2.b)  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, K016, and K017 combined (see section A.2.b)
OAC rule 3745-21-09(U)(1)(i)	3.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09] (See A.2.d)

**2. Additional Terms and Conditions**

- 2.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)(1)(i).
- 2.b 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. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801 combined

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(See B.1).

- ii. Annual HAP emissions from emissions units K003, K016, K017 and P801 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):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
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.

- 2.c** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- 2.d** The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(d) applies to the coating, as applied.

**Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials containing VOC (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801 combined, is limited by the following equation:

$$\sum_{i=1}^n \sum_{M=1}^{12} [V_i \times G_i] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

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

$V_i$  = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

$G_i$  = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emissions units K003, K016, K017 and P801 combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n \sum_{M=1}^{12} [V_i \times G_i] \div 2000$ is less than or equal to
1	10.00
1-2	13.64
1-3	17.28
1-4	20.92

Emissions Unit ID: **K016**

1-5	24.56
1-6	28.20
1-7	31.84
1-8	35.48
1-9	39.12
1-10	42.76
1-11	46.40
1-12	50.00

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

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K016:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of the coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];
2. The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801 combined:
  - a. the company name or identification for each VOC containing material employed;
  - b. the volume, in gallons, of each VOC containing material employed;
  - c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the rolling 12-month summation of VOC emissions from the VOC containing 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

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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 K003, K016, K017 and P801 combined:
- a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in HAP containing material , in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing 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 HAP containing

Emissions Unit ID: **K016**

material 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 HAP containing materials employed (summation of C.3.e for all HAPs for all HAP containing 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 50.00 tons for emissions units K003, K016, K017 and P801 combined.
  - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC containing 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 K003, K016, K017 and P801 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 K003, K016, K017 and P801 combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

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2. 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 material (i.e. coatings and dip tank make-up additions, See A.2.d) 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.

**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:

- a. Emission Limitation  
6.23 lbs VOC/hr

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 gallon per hour) by the maximum OC content of all the coatings (6.23 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.

- b. Emission Limitation:  
50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801combined

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.

- c. 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 K003, K016, K017 and P801combined

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements as specified

**Mayflower Vehicle Systems, Inc.**

**DTL Application: 03 17226**

**Facility ID: 0339020133**

**Emissions Unit ID: K016**

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**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K017) - Coach joint sealer operation (modification of PTI #03-8762, issued on 5/3/1995, to separate primer operations previously permitted as part of K003 and to establish synthetic minor VOC & HAP limitations)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.12 pounds Volatile Organic Compounds (VOC)/hr  See Section A.2.a
OAC rule 3745-31-05(C)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801 combined (see section A.2.b)  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, K016, K017 and P801 combined (see section A.2.b)
OAC rule 3745-21-09(U)(1)(i)	3.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09] (See A.2.d)

**2. Additional Terms and Conditions**

- 2.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)(1)(i).
- 2.b 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. 50.00 tons VOC per rolling, 12-month period based on material usage

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restrictions for emission units K003, K016, K017 and P801 combined (See B.1).

- ii. Annual HAP emissions from emissions units K003, K016, K017 and P801 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):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
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.

- 2.c** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- 2.d** The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(d) applies to the coating, as applied.

**Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials containing VOC (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801 combined, is limited by the following equation:

$$\sum_{i=1}^n \frac{M \cdot V_i \cdot G_i}{2000} \leq 50.00$$

where,

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

$V_i$  = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

$G_i$  = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emissions units K003, K016, K017 and P801 combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n \frac{M \cdot V_i \cdot G_i}{2000}$ is less than or equal to
1	10.00
1-2	13.64
1-3	17.28
1-4	20.92

Emissions Unit ID: **K017**

1-5	24.56
1-6	28.20
1-7	31.84
1-8	35.48
1-9	39.12
1-10	42.76
1-11	46.40
1-12	50.00

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

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K017:
  - a. the name and identification number of each material employed;
  - b. the VOC content of the material employed (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];
2. The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801 combined:
  - a. the company name or identification for each VOC containing material employed;
  - b. the volume, in gallons, of each VOC containing material employed;
  - c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the rolling 12-month summation of VOC emissions from the VOC containing 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

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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 K003, K016, K017 and P801 combined:
- a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in each HAP containing material , in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing 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 HAP containing

Emissions Unit ID: **K017**

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 HAP containing materials employed (summation of C.3.e for all HAPs for all HAP containing 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 50.00 tons for emissions units K003, K016, K017 and P801 combined
  - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC containing 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 K003, K016, K017 and P801 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 K003, K016, K017 and P801 combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

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2. 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 material (i.e. coatings and dip tank make-up additions, See A.2.d) 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.

**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:

- a. Emission Limitation  
0.12 lbs VOC/hr

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 gallon per hour) by the maximum OC content of all the coatings (0.12 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.

- b. Emission Limitation:  
50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801combined

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.

- c. 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 K003, K016, K017 and P801combined

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements as specified

**Mayflower Vehicle Systems, Inc.**

**DTL Application: 03 17226**

**Facility ID: 0339020133**

**Emissions Unit ID: K017**

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**

None

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P801) - Facility wide clean-up operations (modification of PTI #03-8762, issued on 5/3/1995, to separate primer operations previously permitted as part of K003 and to establish synthetic minor VOC & HAP limitations)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	501.7 lbs OC/month
OAC rule 3745-31-05(C)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801 combined (see section A.2.a)  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, K016, K017 and P801 combined (see section A.2.a)
OAC rule 3745-21-07	See Section A.2.b
OAC rule 3745-21-09	See Section A.2.b

**2. Additional Terms and Conditions**

- 2.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. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801 combined (See B.1).
  - ii. Annual HAP emissions from emissions units K003, K016, K017 and P801 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.

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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):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
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.

- 2.b** Emissions from P801 were previously accounted for in K003 when issued in 03-08762 on 5/3/1995. Emissions from clean-up operations associated with that coating line are being separated to ease recordkeeping and reporting. Clean-up operations were previously associated with the miscellaneous metal parts coating standards and have not been modified. Emissions associated with clean-up operations from K003, K016, and K017 are not subject to OAC rule 3745-21-07 because of OAC rule 3745-21-09 applicability to emission units K003, K016, and K017.

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**B. Operational Restrictions**

- The maximum rolling, 12-month quantity of materials containing VOC (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801 combined, is limited by the following equation:

$$\sum_{i=1}^n \sum_{M=1}^{12} [V_i \times G_i] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

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

V<sub>i</sub> = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

G<sub>i</sub> = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emissions units K003, K016, K017 and P801 combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n \sum_{M=1}^{12} [V_i \times G_i] \div 2000$ is less than or equal to
1	10.00
1-2	13.64
1-3	17.28

Emissions Unit ID: P801

1-4	20.92
1-5	24.56
1-6	28.20
1-7	31.84
1-8	35.48
1-9	39.12
1-10	42.76
1-11	46.40
1-12	50.00

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

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for clean-up material usage for the entire facility (emissions unit P801):
  - a. the company identification for each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds
2. The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801 combined:
  - a. the company name or identification for each VOC containing material employed;
  - b. the volume, in gallons, of each VOC containing material employed;
  - c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the rolling 12-month summation of VOC emissions from the VOC containing 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.

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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 K003, K016, K017 and P801 combined:
  - a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in each HAP containing material , in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing material employed (C.3.b x C.3.c) for each individual HAP, in lbs;

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- e. the total emission rate for each individual HAP from all the HAP containing materials employed (for each individual HAP, the summation of C.3.d for all HAP containing materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the HAP containing materials employed (summation of C.3.e for all HAPs for all HAP containing 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 50.00 tons for emissions units K003, K016, K017 and P801 combined
  - b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC containing 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 K003, K016, K017 and P801 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 K003, K016, K017 and P801 combined).

**Issued: To be entered upon final issuance**

- e. All exceedances of the 501.7 lbs OC/month emission limitation.

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 shall be determined in accordance with the following methods:

- a. Emission Limitation  
501.7 lbs OC/month

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section C.1 of this permit.

- b. Emission Limitation:  
50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801 combined

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.

- c. 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 K003, K016, K017 and P801 combined

Applicable Compliance Method

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

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials employed in the emissions unit.

**F. Miscellaneous Requirements**

None