



State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01483**

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 4/9/2002

MAC Trailer Mfg. Inc.
David Wade
14599 Commerce Street
Alliance, OH 44601

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

RECEIVED

APR 15 2002

CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

Canton LAA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 4/9/2002
Effective Date: 4/9/2002**

FINAL PERMIT TO INSTALL 15-01483

Application Number: 15-01483

APS Premise Number: 1576001906

Permit Fee: **\$1600**

Name of Facility: MAC Trailer Mfg. Inc.

Person to Contact: David Wade

Address: 14599 Commerce Street
Alliance, OH 44601

Location of proposed air contaminant source(s) [emissions unit(s)]:
**14599 Commerce Street
Alliance, Ohio**

Description of proposed emissions unit(s):
Sand blast booth and 3 paint booths.

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

Part I - GENERAL TERMS AND CONDITIONS

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the

Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal, or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) 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>
PM	15.86
PM10	15.86
VOC	53.17

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - tractor trailer steel frames paint booth No. 1	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compounds (VOC) emissions shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>See section A.2.a below.</p> <p>The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>The cleanup/purge material employed shall not contain more than 6.8 pounds of VOC per gallon.</p> <p>The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.</p> <p>The particulate emissions (PE) shall not exceed 2.41 tons/year.</p> <p>The PM₁₀ emissions shall not exceed 0.551 lb/hr and 2.41 tons/year.</p> <p>See sections A.2.c and A.2.d below.</p> <p>The requirements of this rule also include compliance with the</p>

OAC rule 3745-17-07(A)(1)

requirements of OAC rule 3745-17-07(A)(1), 3745-17-11(B)(1) and OAC rule 3745-21-09(U).

See section A.2.b below.

Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

OAC rule 3745-17-11(B)(1)

The PE emissions shall not exceed 0.551 lb/hour based on Table 1.

OAC rule 3745-21-09(U)

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

2. Additional Terms and Conditions

- 2.a** The hourly emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with the hourly VOC emission limit.
- 2.b** The maximum annual coating and cleanup/purge material usage and the combined annual emissions from the entire facility (K001 - K003) shall not exceed the following as rolling, 12-month summations:
- 22,000 gallons of top coat employed per year;
 - 8,000 gallons of primer employed per year;
 - 198 gallons of cleanup/purge material net usage per year (material employed minus material recovered);
 - 24.0 tons of all hazardous air pollutants (HAPs); and
 - 9.00 tons of any individual HAP.
- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating and cleanup/purge material usage and the emission levels specified in the following table:

Month(s)	Top Coat Coating Usage (gallons)	Primer Coating Usage (gallons)	Net Cleanup/ Purge Mat. Usage (gallons)	Facility Ind. HAP Limit (tons)	Facility Tot. HAP Limit (tons)
1	1,833	666	16.5	0.75	2.0
1-2	3,667	1,333	33	1.50	4.0
1-3	5,000	2,000	49.5	2.25	6.0
1-4	7,333	2,667	66	3.00	8.0
1-5	9,167	3,333	82.5	3.75	10.0
1-6	11,000	4,000	99	4.50	12.0
1-7	12,833	4,667	115.5	5.25	14.0
1-8	14,667	5,333	132	6.00	16.0
1-9	16,500	6,000	148.5	6.75	18.0
1-10	18,333	6,667	165	7.50	20.0
1-11	20,167	7,333	181.5	8.25	22.0
1-12	22,000	8,000	198	9.00	24.0

2.d After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating and cleanup/purge material usage limitations and facility-wide HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. The permittee shall operate and maintain a fabric filter, in accordance with the manufacturer's recommendations, while this emissions unit is in operation.
2. This emissions unit shall only employ HVLP spray guns.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup/purge material employed in emissions units K001, K002, and K003:
 - a. the name and identification number of each coating and cleanup/purge material, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup/purge material, as applied;
 - c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

D. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division, of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility coating usage limitation and the emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The ~~deviation reports~~ shall be submitted as specified in General Condition A.2 of this permit.
4. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, and K003, and the annual coating usage, in gallons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

The VOC emissions shall not exceed 17.29 pounds/hour from coating operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 lbs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- b. Emissions Limitation:
The VOC emissions shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- c. Emissions Limitation:
The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour from coating operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 lbs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- d. Emissions Limitation:
The combined VOC emissions from emissions units K001-K003 shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for

a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emissions Limitation:

The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Emissions Limitation:

24.0 tpy of all HAPs for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

g. Emissions Limitation:

9.0 tpy of any individual HAP for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- h. Emissions Limitation:
PE and PM₁₀ emissions shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the hourly worst case emission rate for particulate matter, the following equation shall be used:

$$E = CS_h (\text{pounds per hour}) \times (1 - TE) \times (1 - CE)$$

CS_h = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the percent of solids by weight of the paint, and by the maximum amount of paint that can be sprayed in an hour (? gallons)

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for HVLP air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

- i. Emissions Limitation:
PE and PM₁₀ emissions shall not exceed 2.41 tons per year

Applicable Compliance Method:

To determine the annual worst case emissions for particulate matter, the following equation shall be used:

$$E = CS_a (\text{pounds per hour}) \times (1 - TE) \times (1 - CE) / 2000$$

CS_a = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the solids percent by weight, and by the annual gallons of coating used, calculated at the 12th month of the rolling, 12-month record

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

2. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Usage Restriction:

22,000 gallons of top coat coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.e.

b. Usage Restriction:

8,000 gallons of primer coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.e.

c. Usage Restriction:

198 gallons of cleanup/purge material net usage per year (material employed minus material recovered).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.i.

F. Miscellaneous Requirements

1. The permit to install for these emissions unit (K001-K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the 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 this emissions unit 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: methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 2.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,071

MAGLC (ug/m³): 4,880

Pollutant: xylene

TLV (mg/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 2.65
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,408
MAGLC (ug/m³): 10,333

Pollutant: ethyl benzene

TLV (mg/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 0.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 454
MAGLC (ug/m³): 10,333

2. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any 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.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. 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 shows the results of the application of the "Air Toxic Policy" for the change.
4. The following Terms and Conditions are federally enforceable: A.1 & 2, B, C, D and E.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - tractor trailer steel frames paint booth No. 2	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compounds (VOC) emissions shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>See section A.2.a below.</p> <p>The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>The cleanup/purge material employed shall not contain more than 6.8 pounds of VOC per gallon.</p> <p>The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.</p> <p>The particulate emissions (PE) shall not exceed 2.41 tons/year.</p> <p>The PM₁₀ emissions shall not exceed 0.551 lb/hr and 2.41 tons/year.</p> <p>See sections A.2.c and A.2.d below.</p> <p>The requirements of this rule also include compliance with the</p>

OAC rule 3745-17-07(A)(1)	requirements of OAC rule 3745-17-07(A)(1), 3745-17-11(B)(1) and OAC rule 3745-21-09(U). See section A.2.b below.
OAC rule 3745-17-11(B)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule. The PE emissions shall not exceed 0.551 lb/hour based on Table 1.
OAC rule 3745-21-09(U)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

2. Additional Terms and Conditions

- 2.a** The hourly emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with the hourly VOC emission limit.
- 2.b** The maximum annual coating and cleanup/purge material usage and the combined annual emissions from the entire facility (K001 - K003) shall not exceed the following as rolling, 12-month summations:
- 22,000 gallons of top coat employed per year;
 - 8,000 gallons of primer employed per year;
 - 198 gallons of cleanup/purge material net usage per year (material employed minus material recovered);
 - 24.0 tons of all hazardous air pollutants (HAPs); and
 - 9.00 tons of any individual HAP.
- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating and cleanup/purge material usage and the emission levels specified in the following table:

MAC Trailer Mfg. Inc.
 PTI Application: 15-01483
 Issued: 4/9/2002

Facility ID: 1576001906
 Emissions Unit ID: K002

Month(s)	Top Coat Coating Usage (gallons)	Primer Coating Usage (gallons)	Net Cleanup/ Purge Mat. Usage (gallons)	Facility Ind. HAP Limit (tons)	Facility Tot. HAP Limit (tons)
1	1,833	666	16.5	0.75	2.0
1-2	3,667	1,333	33	1.50	4.0
1-3	5,000	2,000	49.5	2.25	6.0
1-4	7,333	2,667	66	3.00	8.0
1-5	9,167	3,333	82.5	3.75	10.0
1-6	11,000	4,000	99	4.50	12.0
1-7	12,833	4,667	115.5	5.25	14.0
1-8	14,667	5,333	132	6.00	16.0
1-9	16,500	6,000	148.5	6.75	18.0
1-10	18,333	6,667	165	7.50	20.0
1-11	20,167	7,333	181.5	8.25	22.0
1-12	22,000	8,000	198	9.00	24.0

- 2.d After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating and cleanup/purge material usage limitations and facility-wide HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. The permittee shall operate and maintain a fabric filter, in accordance with the manufacturer's recommendations, while this emissions unit is in operation.
2. This emissions unit shall only employ HVLP spray guns.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup/purge material employed in emissions units K001, K002, and K003:
 - a. the name and identification number of each coating and cleanup/purge material, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup/purge material, as applied;
 - c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

- d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/purge material employed;
 - g. the individual HAP content for each HAP of each cleanup/purge material, in pounds of individual HAP per gallon of cleanup/purge material, as applied;
 - h. the total combined HAP content of each cleanup/purge material, in pounds of combined HAPs per gallon of cleanup/purge material, as applied (sum all the individual HAP contents from (g));
 - i. the net number of gallons of each cleanup/purge material employed (the number of gallons of cleanup/purge material employed minus the number of gallons of cleanup/purge material recovered);
 - j. the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup/purge materials);
 - k. the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup/purge material);
 - l. the total VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);
 - m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. Additionally, when non-compliant coatings are used during any day, the permittee shall also record the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc, 2.

D. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division, of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility coating usage limitation and the emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The deviation reports shall be submitted as specified in General Condition A.2 of this permit.
4. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, and K003, and the annual coating usage, in gallons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

The VOC emissions shall not exceed 17.29 pounds/hour from coating operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 lbs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emissions Limitation:

The VOC emissions shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

c. **Emissions Limitation:**

The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour from coating operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 lbs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. **Emissions Limitation:**

The combined VOC emissions from emissions units K001-K003 shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- e. Emissions Limitation:
The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- f. Emissions Limitation:
24.0 tpy of all HAPs for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emissions Limitation:
9.0 tpy of any individual HAP for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- h. Emissions Limitation:
PE and PM₁₀ emissions shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the hourly worst case emission rate for particulate matter, the following equation shall be used:

$$E = CS_h (\text{pounds per hour}) \times (1 - TE) \times (1 - CE)$$

CS_h = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the percent of solids by weight of the paint, and by the maximum amount of paint that can be sprayed in an hour (? gallons)

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for HVLP air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

- i. Emissions Limitation:
PE and PM₁₀ emissions shall not exceed 2.41 tons per year

Applicable Compliance Method:

To determine the annual worst case emissions for particulate matter, the following equation shall be used:

$$E = CS_a (\text{pounds per hour}) \times (1 - TE) \times (1 - CE) / 2000$$

CS_a = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the solids percent by weight, and by the annual gallons of coating used, calculated at the 12th month of the rolling, 12-month record

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

2. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Usage Restriction:
22,000 gallons of top coat coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.e.

- b. Usage Restriction:
8,000 gallons of primer coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.e.

- c. Usage Restriction:
198 gallons of cleanup/purge material net usage per year (material employed minus material recovered).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.i.

F. Miscellaneous Requirements

1. The permit to install for these emissions unit (K001-K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the 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 this emissions unit 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: methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 2.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,071

MAGLC (ug/m³): 4,880

Pollutant: xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,408

MAGLC (ug/m³): 10,333

Pollutant: ethyl benzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 454

MAGLC (ug/m³): 10,333

2. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any 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.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. 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 shows the results of the application of the "Air Toxic Policy" for the change.
4. The following Terms and Conditions are federally enforceable: A.1 & 2, B, C, D and E.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - tractor trailer steel frames paint booth No. 3	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compounds (VOC) emissions shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>See section A.2.a below.</p> <p>The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>The cleanup/purge material employed shall not contain more than 6.8 pounds of VOC per gallon.</p> <p>The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.</p> <p>The particulate emissions (PE) shall not exceed 2.41 tons/year.</p> <p>The PM₁₀ emissions shall not exceed 0.551 lb/hr and 2.41 tons/year.</p> <p>See sections A.2.c and A.2.d below.</p> <p>The requirements of this rule also include compliance with the</p>

	requirements of OAC rule 3745-17-07(A)(1), 3745-17-11(B)(1) and OAC rule 3745-21-09(U).
	See section A.2.b below.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty per- cent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-17-11(B)(1)	The PE emissions shall not exceed 0.551 lb/hour based on Table 1.
OAC rule 3745-21-09(U)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

2. Additional Terms and Conditions

- 2.a** The hourly emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with the hourly VOC emission limit.
- 2.b** The maximum annual coating and cleanup/purge material usage and the combined annual emissions from the entire facility (K001 - K003) shall not exceed the following as rolling, 12-month summations:
- 22,000 gallons of top coat employed per year;
 - 8,000 gallons of primer employed per year;
 - 198 gallons of cleanup/purge material net usage per year (material employed minus material recovered);
 - 24.0 tons of all hazardous air pollutants (HAPs); and
 - 9.00 tons of any individual HAP.
- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating and cleanup/purge material usage and the emission levels specified in the following table:

Month(s)	Top Coat Coating Usage (gallons)	Primer Coating Usage (gallons)	Net Cleanup/ Purge Mat. Usage (gallons)	Facility Ind. HAP Limit (tons)	Facility Tot. HAP Limit (tons)
1	1,833	666	16.5	0.75	2.0
1-2	3,667	1,333	33	1.50	4.0
1-3	5,000	2,000	49.5	2.25	6.0
1-4	7,333	2,667	66	3.00	8.0
1-5	9,167	3,333	82.5	3.75	10.0
1-6	11,000	4,000	99	4.50	12.0
1-7	12,833	4,667	115.5	5.25	14.0
1-8	14,667	5,333	132	6.00	16.0
1-9	16,500	6,000	148.5	6.75	18.0
1-10	18,333	6,667	165	7.50	20.0
1-11	20,167	7,333	181.5	8.25	22.0
1-12	22,000	8,000	198	9.00	24.0

2.d After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating and cleanup/purge material usage limitations and facility-wide HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. The permittee shall operate and maintain a fabric filter, in accordance with the manufacturer's recommendations, while this emissions unit is in operation.
2. This emissions unit shall only employ HVLP spray guns.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup/purge material employed in emissions units K001, K002, and K003:
 - a. the name and identification number of each coating and cleanup/purge material, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup/purge material, as applied;
 - c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

- d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/purge material employed;
 - g. the individual HAP content for each HAP of each cleanup/purge material, in pounds of individual HAP per gallon of cleanup/purge material, as applied;
 - h. the total combined HAP content of each cleanup/purge material, in pounds of combined HAPs per gallon of cleanup/purge material, as applied (sum all the individual HAP contents from (g));
 - i. the net number of gallons of each cleanup/purge material employed (the number of gallons of cleanup/purge material employed minus the number of gallons of cleanup/purge material recovered);
 - j. the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup/purge materials);
 - k. the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup/purge material);
 - l. the total VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);
 - m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. Additionally, when non-compliant coatings are used during any day, the permittee shall also record the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for C_{voc} , 2.

D. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division, of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility coating usage limitation and the emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The deviation reports shall be submitted as specified in General Condition A.2 of this permit.
4. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, and K003, and the annual coating usage, in gallons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

The VOC emissions shall not exceed 17.29 pounds/hour from coating operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 lbs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emissions Limitation:

The VOC emissions shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

c. **Emissions Limitation:**

The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour from coating operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 lbs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. **Emissions Limitation:**

The combined VOC emissions from emissions units K001-K003 shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- e. Emissions Limitation:
The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- f. Emissions Limitation:
24.0 tpy of all HAPs for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g. Emissions Limitation:
9.0 tpy of any individual HAP for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record-keeping requirements of section C.1 of these T&Cs.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- h. Emissions Limitation:
PE and PM₁₀ emissions shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the hourly worst case emission rate for particulate matter, the following equation shall be used:

$$E = CS_h (\text{pounds per hour}) \times (1 - TE) \times (1 - CE)$$

CS_h = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the percent of solids by weight of the paint, and by the maximum amount of paint that can be sprayed in an hour (? gallons)

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for HVLP air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

- i. Emissions Limitation:
PE and PM₁₀ emissions shall not exceed 2.41 tons per year

Applicable Compliance Method:

To determine the annual worst case emissions for particulate matter, the following equation shall be used:

$$E = CS_a (\text{pounds per hour}) \times (1 - TE) \times (1 - CE) / 2000$$

CS_a = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the solids percent by weight, and by the annual gallons of coating used, calculated at the 12th month of the rolling, 12-month record

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

2. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Usage Restriction:
22,000 gallons of top coat coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.e.

b. Usage Restriction:

8,000 gallons of primer coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.e.

c. Usage Restriction:

198 gallons of cleanup/purge material net usage per year (material employed minus material recovered).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in section C.1.i.

F. Miscellaneous Requirements

1. The permit to install for these emissions unit (K001-K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the 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 this emissions unit 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: methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 2.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,071

MAGLC (ug/m³): 4,880

Pollutant: xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,408

MAGLC (ug/m³): 10,333

Pollutant: ethyl benzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 454

MAGLC (ug/m³): 10,333

2. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any 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.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. 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 shows the results of the application of the "Air Toxic Policy" for the change.
4. The following Terms and Conditions are federally enforceable: A.1 & 2, B, C, D and E.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Grit blast room with baghouse	OAC rule 3745-31-05(A)(3)	The particulate emissions (PE) shall not exceed 1.97 lbs/hour & 8.63 tons/year. The PM ₁₀ shall not exceed 1.97 lbs/hour & 8.63 tons/year. Visible emissions shall not exceed 5% opacity as a six-minute average. See section A.2.a below.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a "Best Available Technology" (BAT) for this emissions unit has been determined to be use of a baghouse, with a maximum outlet concentration of 0.01 gr/dscf.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

D. Reporting Requirements

1. In accordance with the general terms and conditions of this permit, the permittee shall submit deviation (excursion) reports that identify any and all exceedances of the following:
 - a. All periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

E. Testing Requirements

1. Compliance with the emissions limitations in this permit to install shall be determined in accordance with the following methods:

- a. **Emissions Limitation:**
The particulate emissions (PE) shall not exceed 1.97 lbs/hour & 8.63 tons/year.

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum outlet concentration of 0.01 gr/dscf * a maximum volumetric air flow rate of 23,000 ascfm * 60 minutes/hour * 1 lb/7000 grains. If required, stack testing shall be performed in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. **Emissions Limitation:**
The PM10 emissions shall not exceed 1.97 lbs/hour & 8.63 tons/year.

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum outlet concentration of 0.01 gr/dscf

* a maximum volumetric air flow rate of 23,000 acfm * 60 minutes/hour * 1 lb/7000 grains. If required, stack testing shall be performed in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emissions Limitation:

Visible emissions shall not exceed 5% opacity as a six-minute average

Applicable Compliance Method: If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

None