State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
MERCER COUNTY

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 03-13936

DATE: 4/22/2003

J + M Manufacturing Co., Inc.
Lou Grieshop
PO Box 547 284 Railroad Street
Fort Recovery, OH 45846

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

Very truly yours,
Michael W. Ahern
Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 4/22/2003**
Terms and Conditions	**Effective Date: 4/22/2003**

FINAL PERMIT TO INSTALL 03-13936

Application Number:	03-13936
APS Premise Number:	0354000124
Permit Fee:	**$1400**
Name of Facility:	J + M Manufacturing Co., Inc.
Person to Contact:	Lou Grieshop
Address:	PO Box 547 284 Railroad Street Fort Recovery, OH 45846

Location of proposed air contaminant source(s) [emissions unit(s)]:
284 Railroad Street
Fort Recovery, **Ohio**

Description of proposed emissions unit(s):
Modification to spray booths 2 and 3, inclusion of dip tanks 4, 8, and 9 for synthetic minor.

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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	52.19
Individual HAPS	9.9
Combined HAPS	20

Emissions Unit ID: **K005**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 - Paint Dip Tank 4 (modification to PTI 03-5142 issued June 20, 1990) Modification to include for synthetic minor - updated BAT determination (see F.1)	OAC rule 3745-31-05(A)(3)	47.5 lbs organic compounds (OC)/day for coatings 215.5 lbs OC /month for cleanup /makeup solvent See A.2.a.
	OAC rule 3745-31-05(D)	4.85 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (see A.2.c) 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (see A.2.c)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e) and OAC rule 3745-31-05(D).

2.b The permittee has applied for a PTI to voluntarily limit allowable emissions as provided by OAC rule 3745-31-02(A)(2). This PTI acts upon such application in accordance with OAC rule 3745-31-05 (see A.2.c).

2.c The permittee has requested a federally enforceable limitation for this emissions unit of 4.85 tons of OC (see section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 20 tons of combined HAPs per rolling, 12-month period (see section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 4.75 lbs /gallon. The maximum annual coating usage for this emissions unit shall not exceed 1500 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	125
1-2	250
1-3	375
1-4	500
1-5	625
1-6	750
1-7	875
1-8	1000
1-9	1125
1-10	1250
1-11	1375
1-12	1500

After the first 12 calendar months of operation, compliance with the annual coating usage

limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The OC content of cleanup /makeup solvent used in this emissions unit shall not exceed 7.39 lbs /gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 350 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Solvent Material Usage (gallons)

Month(s)	Gallon Usage
1	29.2
1-2	58.3
1-3	87.5
1-4	116.7
1-5	145.8
1-6	175
1-7	204.2
1-8	233.3
1-9	262.5
1-10	291.7
1-11	320.8
1-12	350

After the first 12 calendar months of operation, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.

3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

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

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs

1-1	0.825	1.67
1-2	1.65	3.33
1-3	2.475	5
1-4	3.3	6.67
1-5	4.125	8.33
1-6	4.95	10
1-7	5.775	11.67
1-8	6.6	13.33
1-9	7.425	15
1-10	8.25	16.67
1-11	9.075	18.33
1-12	9.9	20

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in this emission unit:

   a. the company name and identification for each coating employed;

   b. the OC content of each coating, as applied, in lbs/gal;

   c. the number of gallons of each coating employed;

   d. the total number of gallons of coating employed, summation of (c)

   e. the OC emission rate for each coating, (b) x (c), in lbs per month; and

   f. the total OC emission rate for all coatings, summation of (e) converted to tons per month.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for this emissions unit:

   a. for the first 12 months of operation, the cumulative monthly emission rate of OC for coatings, in tons per month; and,

   b. after the first 12 months of operation, the annual emissions of OC for coatings, based on a

rolling, 12-month summation.

3. The permittee shall collect and record the following each month for cleanup /makeup solvent material usage in this emission unit:

   a. the company name and identification for each solvent material employed;

   b. the OC content of each solvent material, in lbs/gallon;

   c. the number of gallons of each solvent material employed;

   d. the OC emission rate for each solvent material, (b) x (c), in lbs per month;

   e. the total OC emission rate for all solvent materials, summation of (d) converted to tons per month, and

   f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC for solvent materials, in tons per year; and

   g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC for solvent materials, based on a rolling, 12-month summation.

4. In conjunction with the records specified in C.2 and C.3 above, the permittee shall also record the following each month for this emissions unit:

   a. for the first 12 months of operation, the cumulative total monthly emission rate of OC, in tons per month; and,

   b. after the first 12 months of operation, the total annual emissions of OC, based on a rolling, 12-month summation.

5. The permittee shall collect and record the following information regarding HAPs emissions each month for this emission unit:

   a. the company identification of each coating and solvent material employed;

   b. the lbs per gallon of each HAP in each coating and solvent material, as applied;

   c. the number of gallons of each coating and solvent material employed;

d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c) for each HAP in lbs/month;

e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d) for each HAP in lbs/month;

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

g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and

h. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

6. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:

a. for the first 12 months of operation:

i. the cumulative gallon usage rate for each coating;

ii. the total number of gallons of all coatings;

iii. the cumulative gallon usage rate or each solvent material;

iv. the total number of gallons of all solvent material; and,

b. after the first 12 months of operation the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.

7. The permit to install for emission units K005, K009, K010, K011, and K012 was evaluated based on the actual materials (cleanup materials emissions increase for K011 and K012) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

Emissions Unit ID: **K005**

The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 29.56
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1960
MAGLC (ug/m3): 10,350

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 value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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.

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

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

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

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:

   a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;

   b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;

   c. any exceedances of the 4.85 tons OC per rolling, 12-month period;

   d. any exceedances of the 4.75 lbs OC /gallon of coating;

   e. any exceedances of the 7.39 lbs OC /gallon of cleanup /makeup solvent;

   f. any exceedance of the 47.5 lbs OC/day for coatings; and

   g. any exceedances of the 215.5 lbs OC /month for cleanup /makeup solvent.

   The permittee shall submit these deviation (excursion) reports 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 daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air

agency) within 45 days after the exceedance occurs.

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
   47.5 lbs OC/day for coatings
   4.75 lbs OC /gallon of coating

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

   b. Emission Limitation
   215.5 lbs OC /month for cleanup /makeup solvent
   7.39 lbs OC /gallon of cleanup /makeup solvent

   Applicable Compliance Method
   Compliance shall be based on the record keeping requirements as specified in C.3.

   c. Emission Limitation
   4.85 tons OC per rolling, 12-month period

   Applicable Compliance Method
   Compliance shall be based on the record keeping requirements as specified in C.4 and C.6.

   d. Emission Limitation
   not more than 10 gallons of coating usage per day

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

   e. Emission Limitation
   9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

   Applicable Compliance Method
   Compliance shall be based upon the record keeping requirements as specified in C.5.

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

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in PTI 03-5142 as issued on June 20, 1990: A, 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K009 - Paint Dip Tank 8 (modification to PTI 03-6380 issued January 13, 1993) Modification to include for synthetic minor - updated BAT determination (see F.1)	OAC rule 3745-31-05(A)(3)	47.5 lbs organic compounds (OC)/day for coatings 215.5 lbs OC /month for cleanup /makeup solvent See A.2.a.
	OAC rule 3745-31-05(D)	4.85 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (see A.2.c) 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (see A.2.c)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e) and OAC rule 3745-31-05(D).

2.b The permittee has applied for a PTI to voluntarily limit allowable emissions as provided by OAC rule 3745-31-02(A)(2). This PTI acts upon such application in accordance with OAC rule 3745-31-05 (see A.2.c).

2.c The permittee has requested a federally enforceable limitation for this emissions unit of 4.85 tons of OC (see section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 20 tons of combined HAPs per rolling, 12-month period (see section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 4.75 lbs /gallon. The maximum annual coating usage for this emissions unit shall not exceed 1500 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	125
1-2	250
1-3	375
1-4	500
1-5	625
1-6	750
1-7	875
1-8	1000
1-9	1125
1-10	1250
1-11	1375
1-12	1500

After the first 12 calendar months of operation, compliance with the annual coating usage

limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The OC content of cleanup /makeup solvent used in this emissions unit shall not exceed 7.39 lbs /gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 350 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Solvent Material Usage (gallons)

Month(s)	Gallon Usage
1	29.2
1-2	58.3
1-3	87.5
1-4	116.7
1-5	145.8
1-6	175
1-7	204.2
1-8	233.3
1-9	262.5
1-10	291.7
1-11	320.8
1-12	350

After the first 12 calendar months of operation, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.

3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

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

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs

1-1	0.825	1.67
1-2	1.65	3.33
1-3	2.475	5
1-4	3.3	6.67
1-5	4.125	8.33
1-6	4.95	10
1-7	5.775	11.67
1-8	6.6	13.33
1-9	7.425	15
1-10	8.25	16.67
1-11	9.075	18.33
1-12	9.9	20

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in this emission unit:

   a. the company name and identification for each coating employed;

   b. the OC content of each coating, as applied, in lbs/gal;

   c. the number of gallons of each coating employed;

   d. the total number of gallons of coating employed, summation of (c)

   e. the OC emission rate for each coating, (b) x (c), in lbs per month; and

   f. the total OC emission rate for all coatings, summation of (e) converted to tons per month.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for this emissions unit:

   a. for the first 12 months of operation, the cumulative monthly emission rate of OC for coatings, in tons per month; and,

b. after the first 12 months of operation, the annual emissions of OC for coatings, based on a rolling, 12-month summation.

3. The permittee shall collect and record the following each month for cleanup /makeup solvent material usage in this emission unit:

a. the company name and identification for each solvent material employed;

b. the OC content of each solvent material, in lbs/gallon;

c. the number of gallons of each solvent material employed;

d. the OC emission rate for each solvent material, (b) x (c), in lbs per month;

e. the total OC emission rate for all solvent materials, summation of (d) converted to tons per month, and

f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC for solvent materials, in tons per year; and

g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC for solvent materials, based on a rolling, 12-month summation.

4. In conjunction with the records specified in C.2 and C.3 above, the permittee shall also record the following each month for this emissions unit:

a. for the first 12 months of operation, the cumulative total monthly emission rate of OC, in tons per month; and,

b. after the first 12 months of operation, the total annual emissions of OC, based on a rolling, 12-month summation.

5. The permittee shall collect and record the following information regarding HAPs emissions each month for this emission unit:

a. the company identification of each coating and solvent material employed;

b. the lbs per gallon of each HAP in each coating and solvent material, as applied;

c. the number of gallons of each coating and solvent material employed;

d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c) for each HAP in lbs/month;

e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d) for each HAP in lbs/month;

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

g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and

h. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

6. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:

a. for the first 12 months of operation:

i. the cumulative gallon usage rate for each coating;

ii. the total number of gallons of all coatings;

iii. the cumulative gallon usage rate or each solvent material;

iv. the total number of gallons of all solvent material; and,

b. after the first 12 months of operation the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.

7. The permit to install for emission units K005, K009, K010, K011, and K012 was evaluated based on the actual materials (cleanup materials emissions increase for K011 and K012) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN

3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 29.56
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1960
MAGLC (ug/m3): 10,350

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 value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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.

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

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

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

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:

   a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;

   b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;

   c. any exceedances of the 4.85 tons OC per rolling, 12-month period;

   d. any exceedances of the 4.75 lbs OC /gallon of coating;

   e. any exceedances of the 7.39 lbs OC /gallon of cleanup /makeup solvent;

   f. any exceedance of the 47.5 lbs OC/day for coatings; and

   g. any exceedances of the 215.5 lbs OC /month for cleanup /makeup solvent.

   The permittee shall submit these deviation (excursion) reports 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 daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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
47.5 lbs OC/day for coatings
4.75 lbs OC /gallon of coating

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

b. Emission Limitation
215.5 lbs OC /month for cleanup /makeup solvent
7.39 lbs OC /gallon of cleanup /makeup solvent

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.3.

c. Emission Limitation
4.85 tons OC per rolling, 12-month period

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.4 and C.6.

d. Emission Limitation
not more than 10 gallons of coating usage per day

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

e. Emission Limitation
9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.5.

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

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in PTI 03-6380 as issued on January 13, 1993: A, 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K010 - Paint Dip Tank 9 (modification to PTI 03-6380 issued January 13, 1993) Modification to include for synthetic minor - updated BAT determination (see F.1)	OAC rule 3745-31-05(A)(3)	47.5 lbs organic compounds (OC)/day for coatings 215.5 lbs OC /month for cleanup /makeup solvent See A.2.a.
	OAC rule 3745-31-05(D)	4.85 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (see A.2.c) 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (see A.2.c)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e) and OAC rule 3745-31-05(D).

2.b The permittee has applied for a PTI to voluntarily limit allowable emissions as provided by OAC rule 3745-31-02(A)(2). This PTI acts upon such application in accordance with OAC rule 3745-31-05 (see A.2.c).

2.c The permittee has requested a federally enforceable limitation for this emissions unit of 4.85 tons of OC (see section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 20 tons of combined HAPs per rolling, 12-month period (see section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 4.75 lbs /gallon. The maximum annual coating usage for this emissions unit shall not exceed 1500 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	125
1-2	250
1-3	375
1-4	500
1-5	625
1-6	750
1-7	875
1-8	1000
1-9	1125
1-10	1250
1-11	1375
1-12	1500

After the first 12 calendar months of operation, compliance with the annual coating usage

limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The OC content of cleanup /makeup solvent used in this emissions unit shall not exceed 7.39 lbs /gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 350 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Solvent Material Usage (gallons)

Month(s)	Gallon Usage
1	29.2
1-2	58.3
1-3	87.5
1-4	116.7
1-5	145.8
1-6	175
1-7	204.2
1-8	233.3
1-9	262.5
1-10	291.7
1-11	320.8
1-12	350

After the first 12 calendar months of operation, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.

3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

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

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.825	1.67

1-2	1.65	3.33
1-3	2.475	5
1-4	3.3	6.67
1-5	4.125	8.33
1-6	4.95	10
1-7	5.775	11.67
1-8	6.6	13.33
1-9	7.425	15
1-10	8.25	16.67
1-11	9.075	18.33
1-12	9.9	20

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in this emission unit:

   a. the company name and identification for each coating employed;

   b. the OC content of each coating, as applied, in lbs/gal;

   c. the number of gallons of each coating employed;

   d. the total number of gallons of coating employed, summation of (c)

   e. the OC emission rate for each coating, (b) x (c), in lbs per month; and

   f. the total OC emission rate for all coatings, summation of (e) converted to tons per month.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for this emissions unit:

   a. for the first 12 months of operation, the cumulative monthly emission rate of OC for coatings, in tons per month; and,

b. after the first 12 months of operation, the annual emissions of OC for coatings, based on a rolling, 12-month summation.

3. The permittee shall collect and record the following each month for cleanup /makeup solvent material usage in this emission unit:

   a. the company name and identification for each solvent material employed;

   b. the OC content of each solvent material, in lbs/gallon;

   c. the number of gallons of each solvent material employed;

   d. the OC emission rate for each solvent material, (b) x (c), in lbs per month;

   e. the total OC emission rate for all solvent materials, summation of (d) converted to tons per month, and

   f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC for solvent materials, in tons per year; and

   g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC for solvent materials, based on a rolling, 12-month summation.

4. In conjunction with the records specified in C.2 and C.3 above, the permittee shall also record the following each month for this emissions unit:

   a. for the first 12 months of operation, the cumulative total monthly emission rate of OC, in tons per month; and,

   b. after the first 12 months of operation, the total annual emissions of OC, based on a rolling, 12-month summation.

5. The permittee shall collect and record the following information regarding HAPs emissions each month for this emission unit:

   a. the company identification of each coating and solvent material employed;

   b. the lbs per gallon of each HAP in each coating and solvent material, as applied;

   c. the number of gallons of each coating and solvent material employed;

d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c) for each HAP in lbs/month;

e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d) for each HAP in lbs/month;

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

g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and

h. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

6. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:

a. for the first 12 months of operation:

i. the cumulative gallon usage rate for each coating;

ii. the total number of gallons of all coatings;

iii. the cumulative gallon usage rate or each solvent material;

iv. the total number of gallons of all solvent material; and,

b. after the first 12 months of operation the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.

7. The permit to install for emission units K005, K009, K010, K011, and K012 was evaluated based on the actual materials (cleanup materials emissions increase for K011 and K012) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 29.56
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1960
MAGLC (ug/m3): 10,350

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 value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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.

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

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

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

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:

   a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;

   b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;

   c. any exceedances of the 4.85 tons OC per rolling, 12-month period;

   d. any exceedances of the 4.75 lbs OC /gallon of coating;

   e. any exceedances of the 7.39 lbs OC /gallon of cleanup /makeup solvent;

   f. any exceedance of the 47.5 lbs OC/day for coatings; and

   g. any exceedances of the 215.5 lbs OC /month for cleanup /makeup solvent.

   The permittee shall submit these deviation (excursion) reports 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 daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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
47.5 lbs OC/day for coatings
4.75 lbs OC /gallon of coating

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

b. Emission Limitation
215.5 lbs OC /month for cleanup /makeup solvent
7.39 lbs OC /gallon of cleanup /makeup solvent

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.3.

c. Emission Limitation
4.85 tons OC per rolling, 12-month period

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.4 and C.6.

d. Emission Limitation
not more than 10 gallons of coating usage per day

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

e. Emission Limitation
9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.5.

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

F. Miscellaneous Requirements

Emissions Unit ID: **K010**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in PTI 03-5142 as issued on June 20, 1990: A, 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K011 - Paint Spray Booth 2 - with Dry Filters (modification to PTI 03-9368 issued May 30, 1996) modification to allow usage of organic compound cleanup material (see F.1)	OAC rule 3745-31-05(A)(3)	24.5 lbs organic compounds (OC)/hr for coatings 219 lbs OC /month for cleanup solvent (see also A.2.a)
	OAC rule 3745-31-05(D)	18.82 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (see A.2.c) 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (see A.2.c)
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for extreme performance coatings

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).

2.b The permittee has applied for a PTI to voluntarily limit allowable emissions as provided by OAC rule 3745-31-02(A)(2). This PTI acts upon such application in accordance with OAC rule 3745-31-05 (see A.2.c).

2.c The permittee has requested a federally enforceable limitation for this emissions unit of 18.82 tons of OC (see section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 21.5 tons of combined HAPs per rolling, 12-month period (see section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 3.5 lbs /gallon as applied. The maximum annual coating usage for this emissions unit shall not exceed 10,000 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	833
1-2	1667
1-3	2500
1-4	3333
1-5	4167
1-6	5000
1-7	5833
1-8	666
1-9	7500
1-10	8333
1-11	9167
1-12	10,000

After the first 12 calendar months of operation, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The OC content of cleanup solvent used in this emissions unit shall not exceed 7.20 lbs /gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 365 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Solvent Material Usage (gallons)

Month(s)	Gallon Usage
1	30.42
1-2	60.83
1-3	91.25
1-4	121.67
1-5	152.08
1-6	182.5
1-7	212.92
1-8	243.33
1-9	273.75
1-10	304.17
1-11	334.58
1-12	365

After the first 12 calendar months of operation, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.

3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

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

Emissions Unit ID: **K011**

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.825	1.67
1-2	1.65	3.33
1-3	2.475	5
1-4	3.3	6.67
1-5	4.125	8.33
1-6	4.95	10
1-7	5.775	11.67
1-8	6.6	13.33
1-9	7.425	15
1-10	8.25	16.67
1-11	9.075	18.33
1-12	9.9	20

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for coating and cleanup solvent material usage in this emission unit:

   a. the company name and identification for each coating and solvent material employed;

   b. the VOC content of each 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 $C_{VOC,2}$.];

   c. the OC content of each coating, as applied, and solvent material, in lbs/gallon;

   d. the number of gallons of each coating and solvent material employed;

   e. the OC emission rate for each coating and solvent material, (c) x (d), in lbs per month;

   f. the total OC emission rate for all coating and solvent materials, summation of (e) converted to tons per month, and

g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC for coating and solvent materials, in tons per year; and

h. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC for coating and solvent materials, based on a rolling, 12-month summation.

2. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:

a. for the first 12 months of operation:

i. the cumulative gallon usage rate for each coating;

ii. the total number of gallons of all coatings;

iii. the cumulative gallon usage rate of each solvent material;

iv. the total number of gallons of all solvent material; and,

b. after the first 12 months of operation the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.

3. The permittee shall collect and record the following information regarding HAPs emissions each month for this emission unit:

a. the company identification of each coating and solvent material employed;

b. the lbs per gallon of each HAP in each coating and solvent material, as applied;

c. the number of gallons of each coating and solvent material employed;

d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c) for each HAP in lbs/month;

e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d) for each HAP in lbs/month;

f. the total HAP emission rate for the combination of all HAPs from all coatings and

cleanup materials employed, summation of (e) for all HAPs in lbs/month;

g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and

h. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

4. The permit to install for emission units K005, K009, K010, K011, and K012 was evaluated based on the actual materials (cleanup materials emissions increase for K011 and K012) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 29.56
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1960
MAGLC (ug/m3): 10,350

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 value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the

application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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.

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

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

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

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:

a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;

b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;

c. any exceedances of the 3.5 lbs OC /gallon of coating;

d. any exceedances of the 18.82 tons OC per rolling, 12-month period;

e. any exceedances of the 7.20 lbs OC /gallon of cleanup solvent;

f. any exceedances of the 219 lbs OC /month for cleanup /makeup solvent.

The permittee shall submit these deviation (excursion) reports 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 VOC noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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
24.5 lbs OC/hr for coatings

Applicable Compliance Method
The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a maximum gallon usage of 7.00 gal/hr and a maximum OC content of 3.50 lbs/gal.

b. Emission Limitation
3.5 lbs OC /gallon of coating
219 lbs OC /month for cleanup solvent
7.2 lbs OC /gallon of cleanup solvent

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

c. Emission Limitation
18.82 tons OC per rolling, 12-month period

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

d. Emission Limitation
3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

e. Emission Limitation
9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

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

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

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in PTI 03-9368 as issued on May 30, 1996: A, 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K012 - Paint Spray Booth 3 - with Dry Filters (modification to PTI 03-9368 issued May 30, 1996) modification to allow usage of organic compound cleanup material (see F.1)	OAC rule 3745-31-05(A)(3)	24.5 lbs organic compounds (OC)/hr for coatings 219 lbs OC /month for cleanup solvent (see also A.2.a)
	OAC rule 3745-31-05(D)	18.82 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (see A.2.c) 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (see A.2.c)
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for extreme performance coatings

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).

2.b The permittee has applied for a PTI to voluntarily limit allowable emissions as provided by OAC rule 3745-31-02(A)(2). This PTI acts upon such application in accordance with OAC rule 3745-31-05 (see A.2.c).

2.c The permittee has requested a federally enforceable limitation for this emissions unit of 18.82 tons of OC (see section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 21.5 tons of combined HAPs per rolling, 12-month period (see section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 3.5 lbs /gallon as applied. The maximum annual coating usage for this emissions unit shall not exceed 10,000 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	833
1-2	1667
1-3	2500
1-4	3333
1-5	4167
1-6	5000
1-7	5833
1-8	666
1-9	7500
1-10	8333
1-11	9167
1-12	10,000

After the first 12 calendar months of operation, compliance with the annual coating usage

limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The OC content of cleanup solvent used in this emissions unit shall not exceed 7.20 lbs /gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 365 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Solvent Material Usage (gallons)

Month(s)	Gallon Usage
1	30.42
1-2	60.83
1-3	91.25
1-4	121.67
1-5	152.08
1-6	182.5
1-7	212.92
1-8	243.33
1-9	273.75
1-10	304.17
1-11	334.58
1-12	365

After the first 12 calendar months of operation, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.

3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

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

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.825	1.67
1-2	1.65	3.33
1-3	2.475	5
1-4	3.3	6.67
1-5	4.125	8.33
1-6	4.95	10
1-7	5.775	11.67
1-8	6.6	13.33
1-9	7.425	15
1-10	8.25	16.67
1-11	9.075	18.33
1-12	9.9	20

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for coating and cleanup solvent material usage in this emission unit:

   a. the company name and identification for each coating and solvent material employed;

   b. the VOC content of each 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 $C_{VOC,2}$.];

   c. the OC content of each coating, as applied, and solvent material, in lbs/gallon;

   d. the number of gallons of each coating and solvent material employed;

   e. the OC emission rate for each coating and solvent material, (c) x (d), in lbs per month;

   f. the total OC emission rate for all coating and solvent materials, summation of (e) converted to tons per month, and

g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC for coating and solvent materials, in tons per year; and

h. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC for coating and solvent materials, based on a rolling, 12-month summation.

2. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:

a. for the first 12 months of operation:

i. the cumulative gallon usage rate for each coating;

ii. the total number of gallons of all coatings;

iii. the cumulative gallon usage rate of each solvent material;

iv. the total number of gallons of all solvent material; and,

b. after the first 12 months of operation the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.

3. The permittee shall collect and record the following information regarding HAPs emissions each month for this emission unit:

a. the company identification of each coating and solvent material employed;

b. the lbs per gallon of each HAP in each coating and solvent material, as applied;

c. the number of gallons of each coating and solvent material employed;

d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c) for each HAP in lbs/month;

e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d) for each HAP in lbs/month;

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

g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and

h. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

4. The permit to install for emission units K005, K009, K010, K011, and K012 was evaluated based on the actual materials (cleanup materials emissions increase for K011 and K012) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 435
Maximum Hourly Emission Rate (lbs/hr): 29.56
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1960
MAGLC (ug/m3): 10,350

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 value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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.

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

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

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

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:

a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;

b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;

c. any exceedances of the 3.5 lbs OC /gallon of coating;

d. any exceedances of the 18.82 tons OC per rolling, 12-month period;

e. any exceedances of the 7.20 lbs OC /gallon of cleanup solvent;

f. any exceedances of the 219 lbs OC /month for cleanup /makeup solvent.

The permittee shall submit these deviation (excursion) reports 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 VOC noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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
   24.5 lbs OC/hr for coatings

   Applicable Compliance Method
   The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

   *The potential to emit is based on a maximum gallon usage of 7.00 gal/hr and a maximum OC content of 3.50 lbs/gal.

   b. Emission Limitation
   3.5 lbs OC /gallon of coating
   219 lbs OC /month for cleanup solvent
   7.2 lbs OC /gallon of cleanup solvent

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

   c. Emission Limitation
   18.82 tons OC per rolling, 12-month period

   Applicable Compliance Method

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

d. Emission Limitation
3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

e. Emission Limitation
9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

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

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

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in PTI 03-9368 as issued on May 30, 1996: A, B, C, D, and E.