

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **03-13695**

**A. Source Description**

This facility is involved in the coating of cement mixers which involves 6 miscellaneous metal parts coating operations and a sandblasting operation.

**B. Facility Emissions and Attainment Status**

The unrestricted potential emissions of volatile organic compounds (VOC) exceed the Title V major source threshold of 100 tons. The unrestricted potential emissions of a single hazardous air pollutant (HAP) and total combined HAPs exceeds the Maximum Achievable Control Technology (MACT) major source thresholds of 10 tons per year for a single HAP and 25 tons per year for combined HAPs. The facility is requesting synthetic minor limitations on organic compounds (OC) and HAPs to avoid Title V and MACT applicability. The facility is located in Paulding County which is in attainment for ozone and all other criteria pollutants.

**C. Source Emissions**

The facility is requesting a synthetic minor limitation of 27.72 tons per year of organic compound (OC) emissions from all coating operations combined based on a coating usage restriction of 15,840 gallons per year. The volatile organic compound (VOC) content of all coatings is limited to 3.5 pounds per gallon by OAC rule 3745-21-09(U)(1)(c). For purposes of federal enforceability a limitation on OC effectively restricts VOC. The facility is also requesting synthetic minor limitations of 9.15 tons per year for a single HAP and 22.23 tons for all HAPs from all coating operations combined. The synthetic minor limitations on OC and HAPs will establish the facility as a minor source for Title V and MACT purposes.

**D. Conclusion**

This permit action will establish Steve Reiff, Incorporated as a minor facility for purposes of avoiding Title V and MACT applicability.



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 03-13695**

**Fac ID: 0363000039**

**DATE: 10/26/2006**

Steve Reiff, Incorporated  
Doug Reiff  
5650 N. 800 S.  
South Whitley, IN 46787

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1800** will be due. Please do not submit any payment now.

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NWDO

IN

MI

**PAULDING COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-13695 FOR AN AIR CONTAMINANT SOURCE FOR  
Steve Reiff, Incorporated**

On 10/26/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Steve Reiff, Incorporated**, located at **5196 U.S. Route 24 East, Antwerp, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13695:

**Installation of (6) paint spray booths and sand blasting operation.**

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

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



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 03-13695**

Application Number: 03-13695  
Facility ID: 0363000039  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Steve Reiff, Incorporated  
Person to Contact: Doug Reiff  
Address: 5650 N. 800 S.  
South Whitley, IN 46787

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**5196 U.S. Route 24 East  
Antwerp, Ohio**

Description of proposed emissions unit(s):  
**Installation of (6) paint spray booths and sand blasting operation.**

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

## **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,

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

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

**Steve Reiff, Incorporated**  
**PTI Application: 03-13695**

**Facility ID: 0363000039**

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

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

**Steve Reiff, Incorporated**  
**PTI Application: 03-13695**

**Facility ID: 0363000039**

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

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

Emissions Unit ID: **F001**

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

#### 14. Construction Compliance Certification

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

#### 15. Fees

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	35.48
individual HAP	9.15
total HAPs	22.23
PE	1.62

**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>
F001 - Sandblasting operation	OAC rule 3745-31-05(A)(3)	1.62 tons particulate emissions (PE)/yr
	OAC rule 3745-17-08 (A)	Visible particulate emissions shall not exceed 20% opacity as a three-minute average from enclosure
	OAC rule 3745-17-07 (B)(1)	See A.2.a
		See A.2.b
		See A.2.c

**2. Additional Terms and Conditions**

**2.a** Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the following:

- i. all sandblasting operations shall be conducted within a total enclosure; and
- ii. upon completion of daily sandblasting operations, the company shall clean up and properly dispose of all sandblasting wastes to prevent the material from becoming airborne.

**2.b** Steve Reiff, Inc. is not located within an "Appendix A" area as identified in OAC

Emissions Unit ID: **F001**

rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B)(1).

- 2.c** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07 (B)(11)(e).

**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **F001****B. Operational Restrictions**

1. The maximum annual abrasive material usage in this emission unit shall not exceed 240 tons.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for the abrasive material usage in emissions unit F001:
  - a. the monthly abrasive material usage employed, in tons per month; and

**Steve**

**PTI A**

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

Emissions Unit ID: **F001**

- b. the annual, year to date abrasive material usage employed (sum of (a) for each calendar month to date from January to December), in tons per year.

**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **F001****D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that summarize the total annual actual abrasive material usage, in tons for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the allowable emission limitations in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:  
1.62 tons PE/yr

Applicable Compliance Method:

The emission limitation was established by applying a 75% control efficiency for use of a total enclosure to an uncontrolled emission rate of 6.84 tons per year. The uncontrolled emission rate was determined by multiplying the restricted throughput of abrasive material of 240 tons per year (480,000 lbs) by the appropriate emission factor from AP-42 Chapter 13.2.6 (9/97) (27 tons PE/1000 lbs of abrasive material). Therefore, provided compliance is shown with the restricted abrasive material throughput, compliance with the annual emission limitation will be assumed.

- b. Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity as a three-minute average from enclosure

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such



**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K001**

Applicable Emissions  
Limitations/Control Measures

10.50 lbs organic compounds (OC)/hr, from coating operations

1,293.75 lbs OC/month, 7.76 tons OC/yr, from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined]

See A.2.a

27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] (See A.2.b.i and B.1)

9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006 combined] (See A.2.b.ii)

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating

Steve  
PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

**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(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
  - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.76	1.85
1-2	1.52	3.71
1-3	2.29	5.56
1-4	3.05	7.41
1-5	3.81	9.26
1-6	4.57	11.11
1-7	5.33	12.96
1-8	6.09	14.81
1-9	6.84	16.66
1-10	7.60	18.51
1-11	8.36	20.36
1-12	9.15	22.23

After the first 12 calendar months of operation following the issuance of

**Steve****PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	1,320
1-2	2,640
1-3	3,960
1-4	5,280
1-5	6,600
1-6	7,920
1-7	9,240
1-8	10,560
1-9	11,880
1-10	13,200
1-11	14,520
1-12	15,840

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

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

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
- a. the name and identification number of each coating employed; and

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

- b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ].
2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
    - a. the name and identification number of each coating employed;
    - b. the OC content of each coating, as applied, in pounds per gallon;
    - c. the number of gallons of each coating employed;
    - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
    - e. the rolling, 12-month coatings usage rates, in gallons;
    - f. the OC emission rate for each coating employed ( $C.2.b \times C.2.c$ ), in pounds;
    - g. the total OC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;
    - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
    - i. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
    - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
    - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

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

**Steve  
PTI A**

Emissions Unit ID: **K001**

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

3. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
  
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs

**Steve****PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

combined, in tons; and

- h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1198.2

MAGLC (ug/m3): 4485.8

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

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

- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.

**Steve****PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

- b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
- c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.
- e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- f. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, K004, K005, and K006, combined).

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

- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

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

- a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable

Steve  
PTI A

Emissions Unit ID: **K001**

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

OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

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

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements

**Steve**

**PTI A**

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

specified in section C.2 of this permit.

Emissions Unit ID: **K001**

**F. Miscellaneous Requirements**

None

Steve

PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K002 - miscellaneous metal parts coating operation (Paint Booth #2)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(c)
	OAC rule 3745-31-05(C)	

**Steve**

**PTI A**

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

Emissions Unit ID: **K002**

Applicable Emissions  
Limitations/Control Measures

10.50 lbs organic compounds  
(OC)/hr, from coating  
operations

1,293.75 lbs OC/month, 7.76  
tons OC/yr, from cleanup  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006, combined]

See A.2.a

27.72 tons of OC per rolling,  
12-month period from coating  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006 combined] (See  
A.2.b.i and B.1)

9.15 tons per rolling, 12-month  
period for any individual  
Hazardous Air Pollutant (HAP)  
and 22.23 tons per rolling,  
12-month period for any  
combination of HAPs [for  
emission units from K001,  
K002, K003, K004, K005, and  
K006 combined] (See A.2.b.ii)

3.5 pounds VOC per gallon of  
coating, excluding water and  
exempt solvents, for extreme  
performance coating

**2. Additional Terms and Conditions**

Steve  
PTI A

Emissions Unit ID: **K002**

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

- 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(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
  - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.76	1.85
1-2	1.52	3.71
1-3	2.29	5.56
1-4	3.05	7.41
1-5	3.81	9.26
1-6	4.57	11.11
1-7	5.33	12.96
1-8	6.09	14.81
1-9	6.84	16.66
1-10	7.60	18.51
1-11	8.36	20.36
1-12	9.15	22.23

After the first 12 calendar months of operation following the issuance of this

Emissions Unit ID: **K002**

permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.d** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

## B. Operational Restrictions

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	1,320
1-2	2,640
1-3	3,960
1-4	5,280
1-5	6,600
1-6	7,920
1-7	9,240
1-8	10,560
1-9	11,880
1-10	13,200
1-11	14,520
1-12	15,840

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

## C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:

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

- a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ].
2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the OC emission rate for each coating employed ( $C.2.b \times C.2.c$ ), in pounds;
  - g. the total OC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;
  - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
  - i. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
  - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
  - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

Note: The information required above must be recorded for the materials as applied,

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

including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
  
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs;

- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
    - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1198.2

MAGLC (ug/m<sup>3</sup>): 4485.8

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

**Steve  
PTI A**

Emissions Unit ID: **K002**

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

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days

following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
  - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.
  - e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - f. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, K004, K005, and K006, combined).

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

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

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

Steve  
PTI A

Emissions Unit ID: **K002**

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

- a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

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

- b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

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

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation

Emissions Unit ID: **K002**

above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

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

#### F. Miscellaneous Requirements

None

Steve  
PTI A

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K003 - miscellaneous metal parts coating operation (Paint Booth #3)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(c)
	OAC rule 3745-31-05(C)	

**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K003**

Applicable Emissions  
Limitations/Control Measures

10.50 lbs organic compounds  
(OC)/hr, from coating  
operations

1,293.75 lbs OC/month, 7.76  
tons OC/yr, from cleanup  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006, combined]

See A.2.a

27.72 tons of OC per rolling,  
12-month period from coating  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006 combined] (See  
A.2.b.i and B.1)

9.15 tons per rolling, 12-month  
period for any individual  
Hazardous Air Pollutant (HAP)  
and 22.23 tons per rolling,  
12-month period for any  
combination of HAPs [for  
emission units from K001,  
K002, K003, K004, K005, and  
K006 combined] (See A.2.b.ii)

3.5 pounds VOC per gallon of  
coating, excluding water and  
exempt solvents, for extreme  
performance coating

## **2. Additional Terms and Conditions**

Steve  
PTI A

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

- 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(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
  - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.76	1.85
1-2	1.52	3.71
1-3	2.29	5.56
1-4	3.05	7.41
1-5	3.81	9.26
1-6	4.57	11.11
1-7	5.33	12.96
1-8	6.09	14.81
1-9	6.84	16.66
1-10	7.60	18.51
1-11	8.36	20.36
1-12	9.15	22.23

After the first 12 calendar months of operation following the issuance of this

**Steve****PTI A**Emissions Unit ID: **K003****Issued: To be entered upon final issuance**

permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.d** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	1,320
1-2	2,640
1-3	3,960
1-4	5,280
1-5	6,600
1-6	7,920
1-7	9,240
1-8	10,560
1-9	11,880
1-10	13,200
1-11	14,520
1-12	15,840

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

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

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
- the name and identification number of each coating employed; and
  - the VOC content of each coating (excluding water and exempt solvents), in

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

pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ].

2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the OC emission rate for each coating employed (C.2.b x C.2.c), in pounds;
  - g. the total OC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;
  - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
  - i. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
  - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
  - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

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

3. The permittee shall collect and record the following each month for cleanup operations

**Steve  
PTI A**

Emissions Unit ID: **K003**

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

in emissions units K001, K002, K003, K004, K005, and K006, combined:

- a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs

**Steve****PTI A**Emissions Unit ID: **K003****Issued: To be entered upon final issuance**

combined, in tons; and

- h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1198.2MAGLC (ug/m<sup>3</sup>): 4485.8

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

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

- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.

**Steve****PTI A**Emissions Unit ID: **K003****Issued: To be entered upon final issuance**

- b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
- c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.
- e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- f. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, K004, K005, and K006, combined).

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

- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## **E. Testing Requirements**

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

- a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

Steve  
PTI A

Emissions Unit ID: **K003**

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

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

- b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

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

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Steve

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K004**

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

#### F. Miscellaneous Requirements

None

### 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	<u>Applicable Rules/Requirements</u>
K004 - miscellaneous metal parts coating operation (Paint Booth #4)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

Steve  
PTI A

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

Applicable Emissions  
Limitations/Control Measures

	10.50 lbs organic compounds (OC)/hr, from coating operations
OAC rule 3745-21-09(U)(1)(c)	1,293.75 lbs OC/month, 7.76 tons OC/yr, from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined]
	See A.2.a
	27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] (See A.2.b.i and B.1)
	9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006 combined] (See A.2.b.ii)
	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating

**2. Additional Terms and Conditions**

**Steve  
PTI A**

Emissions Unit ID: **K004**

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

- 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(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
  - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.76	1.85
1-2	1.52	3.71
1-3	2.29	5.56
1-4	3.05	7.41
1-5	3.81	9.26
1-6	4.57	11.11
1-7	5.33	12.96
1-8	6.09	14.81
1-9	6.84	16.66
1-10	7.60	18.51
1-11	8.36	20.36
1-12	9.15	22.23

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a

Emissions Unit ID: **K004**

rolling, 12-month summation of the monthly emission rates.

- 2.d** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

## B. Operational Restrictions

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	1,320
1-2	2,640
1-3	3,960
1-4	5,280
1-5	6,600
1-6	7,920
1-7	9,240
1-8	10,560
1-9	11,880
1-10	13,200
1-11	14,520
1-12	15,840

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

## C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
- a. the name and identification number of each coating employed; and

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

- b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ].
2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
    - a. the name and identification number of each coating employed;
    - b. the OC content of each coating, as applied, in pounds per gallon;
    - c. the number of gallons of each coating employed;
    - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
    - e. the rolling, 12-month coatings usage rates, in gallons;
    - f. the OC emission rate for each coating employed (C.2.b x C.2.c), in pounds;
    - g. the total OC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;
    - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
    - i. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
    - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
    - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

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

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

3. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
  
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs;

Emissions Unit ID: **K004**

- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
    - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1198.2

MAGLC (ug/m3): 4485.8

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;

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

- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

Emissions Unit ID: **K004**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
  - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.
  - e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - f. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Steve  
PTI A

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

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

- b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

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

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to

Emissions Unit ID: **K004**

determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

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

#### F. Miscellaneous Requirements

None

Steve  
PTI A

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K005 - miscellaneous metal parts coating operation (Paint Booth #5)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(c)
	OAC rule 3745-31-05(C)	

**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K005**

Applicable Emissions  
Limitations/Control Measures

10.50 lbs organic compounds  
(OC)/hr, from coating  
operations

1,293.75 lbs OC/month, 7.76  
tons OC/yr, from cleanup  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006, combined]

See A.2.a

27.72 tons of OC per rolling,  
12-month period from coating  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006 combined] (See  
A.2.b.i and B.1)

9.15 tons per rolling, 12-month  
period for any individual  
Hazardous Air Pollutant (HAP)  
and 22.23 tons per rolling,  
12-month period for any  
combination of HAPs [for  
emission units from K001,  
K002, K003, K004, K005, and  
K006 combined] (See A.2.b.ii)

3.5 pounds VOC per gallon of  
coating, excluding water and  
exempt solvents, for extreme  
performance coating

## **2. Additional Terms and Conditions**

Steve

PTI A

Emissions Unit ID: **K005****Issued: To be entered upon final issuance**

- 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(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
  - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.76	1.85
1-2	1.52	3.71
1-3	2.29	5.56
1-4	3.05	7.41
1-5	3.81	9.26
1-6	4.57	11.11
1-7	5.33	12.96
1-8	6.09	14.81
1-9	6.84	16.66
1-10	7.60	18.51
1-11	8.36	20.36
1-12	9.15	22.23

After the first 12 calendar months of operation following the issuance of

**Steve  
PTI A**

Emissions Unit ID: **K005**

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

this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.d** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	1,320
1-2	2,640
1-3	3,960
1-4	5,280
1-5	6,600
1-6	7,920
1-7	9,240
1-8	10,560
1-9	11,880
1-10	13,200
1-11	14,520
1-12	15,840

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

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

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
- a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating (excluding water and exempt solvents), in

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

pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ].

2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the OC emission rate for each coating employed (C.2.b x C.2.c), in pounds;
  - g. the total OC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;
  - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
  - i. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
  - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
  - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

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

3. The permittee shall collect and record the following each month for cleanup operations

**Steve  
PTI A**

Emissions Unit ID: **K005**

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

in emissions units K001, K002, K003, K004, K005, and K006, combined:

- a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs

**Steve****PTI A**Emissions Unit ID: **K005****Issued: To be entered upon final issuance**

combined, in tons; and

- h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1198.2MAGLC (ug/m<sup>3</sup>): 4485.8

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

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

- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.

**Steve****PTI A**Emissions Unit ID: **K005****Issued: To be entered upon final issuance**

- b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
- c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.
- e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- f. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, K004, K005, and K006, combined).

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

- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## **E. Testing Requirements**

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

- a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

Steve

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K005**

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

- b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

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

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

**Steve**

**PTI A**

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

Emissions Unit ID: **K005**

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

**F. Miscellaneous Requirements**

None

Steve

PTI A

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K006 - miscellaneous metal parts coating operation (Paint Booth #6)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(c)
	OAC rule 3745-31-05(C)	

**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K006**

Applicable Emissions  
Limitations/Control Measures

10.50 lbs organic compounds  
(OC)/hr, from coating  
operations

1,293.75 lbs OC/month, 7.76  
tons OC/yr, from cleanup  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006, combined]

See A.2.a

27.72 tons of OC per rolling,  
12-month period from coating  
operations [for emission units  
K001, K002, K003, K004, K005,  
and K006 combined] (See  
A.2.b.i and B.1)

9.15 tons per rolling, 12-month  
period for any individual  
Hazardous Air Pollutant (HAP)  
and 22.23 tons per rolling,  
12-month period for any  
combination of HAPs [for  
emission units from K001,  
K002, K003, K004, K005, and  
K006 combined] (See A.2.b.ii)

3.5 pounds VOC per gallon of  
coating, excluding water and  
exempt solvents, for extreme  
performance coating

## **2. Additional Terms and Conditions**

Steve  
PTI A

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

- 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(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
  - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.76	1.85
1-2	1.52	3.71
1-3	2.29	5.56
1-4	3.05	7.41
1-5	3.81	9.26
1-6	4.57	11.11
1-7	5.33	12.96
1-8	6.09	14.81
1-9	6.84	16.66
1-10	7.60	18.51
1-11	8.36	20.36
1-12	9.15	22.23

After the first 12 calendar months of operation following the issuance of

Emissions Unit ID: **K006**

this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.d** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

## B. Operational Restrictions

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	1,320
1-2	2,640
1-3	3,960
1-4	5,280
1-5	6,600
1-6	7,920
1-7	9,240
1-8	10,560
1-9	11,880
1-10	13,200
1-11	14,520
1-12	15,840

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

## C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:

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

- a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ].
2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the OC emission rate for each coating employed ( $C.2.b \times C.2.c$ ), in pounds;
  - g. the total OC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;
  - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
  - i. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
  - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
  - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

Note: The information required above must be recorded for the materials as applied,

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

including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
  
4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs;

- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
    - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1198.2

MAGLC (ug/m<sup>3</sup>): 4485.8

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

**Steve  
PTI A**

Emissions Unit ID: **K006**

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

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
  - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.
  - e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).
  - f. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, K004, K005, and K006, combined).

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

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

**Steve****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K006**Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

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

- b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

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

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section

Emissions Unit ID: **K006**

C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

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

#### F. Miscellaneous Requirements

None