

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install 03-17029

**A. Source Description**

This permit addresses three coating operations, R001, R002, & R004, at Unverfurth Mfg. Co., Inc. in Delphos, Ohio. All three spray booths coat miscellaneous metal parts.

**B. Facility Emissions and Attainment Status**

The facility currently has permits which restrict the potential emissions of VOC to less 100 tons per year. The facility is potentially a major source for Maximum Achievable Control Technology (MACT) for HAP emissions. Van Wert County is in attainment/unclassifiable for all criteria pollutants.

**C. Source Emissions**

**Potential VOC Emissions:** The facility has current permits which restrict the potential emissions of VOC to less than 100 tons per year.

**Potential HAPs Emissions:** The potential emissions from R001, R002 & R004 are greater than 10 tons/yr for individual HAPs and 25 tons/yr for aggregate HAPs.

**Restricted VOC Emissions:** This permit revises and re-establishes potential VOC emissions at the facility through synthetic minor restrictions. The facility has accepted federally enforceable restrictions combined for R001, R002 & R004 on coating usage (17,000 gallons per year) and a coating content restriction of 3.5 lbs VOC/gal to maintain their VOC emissions below 100 tons per year.

Coatings: (17,000 gal/yr) (3.5 lbs VOC/gal) (tons/2000 lbs) = 29.75 tons VOC/yr  
Cleanup: 3.92 tons per year from R001, R002, & R004 combined

Total Potential VOC Emissions With Restrictions: 29.75 tons VOC/yr + 3.92 tons VOC/yr = 33.67 tons VOC/yr

**Restricted HAP Emissions:** The potential HAP emissions for R001, R002 & R004 would trigger the Title V threshold. To ensure that the Title V thresholds for HAPs are not triggered, the facility has requested to restrict HAP emissions resulting from the use of coatings and cleanup materials in R001, R002 & R004 combined to less than 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs.

**D. Conclusion**

With the coating gallon usage restrictions, the coating VOC content restriction and the rolling HAP limitations, the VOC will remain below 100 tons per year and HAP emissions will be below MACT and Title V thresholds. Therefore, the facility will not be subject to Title V or MACT requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
VAN WERT COUNTY**

**CERTIFIED MAIL**

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**Application No:** 03-17029

**Fac ID:** 0381000012

**DATE:** 1/26/2006

Unverferth Mfg. Co., Inc.  
Greg Steinecker  
18107 US 224 West  
Kalida, OH 45853

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

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

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

Sincerely,

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

CC: USEPA

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**VAN WERT COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17029** FOR AN AIR CONTAMINANT SOURCE FOR  
**Unverferth Mfg. Co., Inc.**

On 1/26/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Unverferth Mfg. Co., Inc.**, located at **24325 State Route 697 West, Delphos, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17029:

**Modification to (4) paint spray booths to obtain synthetic minor status.**

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]



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 03-17029**

Application Number: 03-17029  
Facility ID: 0381000012  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Unverferth Mfg. Co., Inc.  
Person to Contact: Greg Steinecker  
Address: 18107 US 224 West  
Kalida, OH 45853

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**24325 State Route 697 West  
Delphos, Ohio**

Description of proposed emissions unit(s):  
**Modification to (4) paint spray booths to obtain synthetic minor status.**

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

Unverferth Mfg. Co., Inc.

PTI Application: 03-17029

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0381000012

## **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,

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**Facility ID: 0381000012**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

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

**Unverferth Mfg. Co., Inc.**

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

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

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

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

#### **11. Applicability**

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

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

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

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

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

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

**14. Construction Compliance Certification**

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

**15. Fees**

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
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**Unverferth Mfg. Co., Inc.**

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<b>Volatile Organic Compounds (VOC)</b>	<b>33.67</b>
<b>Individual Hazardous Air Pollutants (HAPs)</b>	<b>9.9</b>
<b>Combined HAPs</b>	<b>24.9</b>

**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>
R001 - miscellaneous metal parts paint booth #1, equipped with dry filtration (modification of existing emissions unit to revise federally enforceable limitations for VOCs and establish federally enforceable limitations for HAPs)	OAC rule 3745-31-05(A)(3)	23.14 lbs volatile organic compounds (VOC)/hr, from coating operations  652.5 lbs VOC/month, 3.92 tons VOC/yr, from cleanup operations [for emission units R001, R002, and R004, combined]
	OAC rule 3745-31-05(C)	See A.2.a.  29.75 tons of VOC per rolling, 12-month period from the coating operations [for emission units R001, R002, and R004, combined] (See A.2.b.i, B.1 and B.2.)
		9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units R001, R002, and R004, combined] (See A.2.b.ii.)

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of 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. 29.75 tons VOC per rolling, 12-month period based on coating usage restrictions for emission units R001, R002, and R004, combined, and a coating VOC content restriction (See B.1 and B.2).
  - ii. Annual HAP emissions from emissions units R001, R002, and R004, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

### Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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

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- 2.c** This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Van Wert County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

- 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 R001, R002, and R004, combined, shall not exceed 17,000 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	1417
1-2	2834
1-3	4251
1-4	5668
1-5	7085
1-6	8502
1-7	9919
1-8	11,336
1-9	12,753
1-10	14,170
1-11	15,587

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Emissions Unit ID: **R001**

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1-12	17,000
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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.

2. The VOC content of each coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.

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

1. The permittee shall collect and record the following information each month for all the coatings employed for emissions units R001, R002, and R004, combined:
  - a. the name and identification number of each coating employed;
  - b. the VOC 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.1.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the VOC emission rate for each coating employed (C.1.b x C.1.c), in pounds;
  - g. the total VOC emission rate for all the coatings employed (summation of C.1.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 VOC 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 VOC 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.

2. The permittee shall collect and record the following each month for cleanup operations in emissions units R001, R002, and R004, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total VOC emissions from all the cleanup materials employed (summation of C.2.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.2.e for each calendar month to date from January to December).
  
3. The permittee shall collect and record the following HAP information each month for emissions units R001, R002, and R004, 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.3.b x C.3.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.3.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.3.e for all HAPs for all coatings

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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.

**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 VOC emission limitation of 29.75 tons.
  - b. All exceedances of the monthly VOC emission limitation of 652.5 pounds (from the cleanup operations for emissions units R001, R002 and R004, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 17,000 gallons (for emissions units R001, R002, and R004, 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 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R004, 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 R001, R002, and R004, combined).

**Unverferth Mfg. Co., Inc.**  
**PTI Application: 03-17020**  
**Issue**

**Facility ID: 0381000012**

**Emissions Unit ID: R001**

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 VOC emissions from the cleanup operations (for emissions units R001, R002, and R004 ,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: 23.14 lbs VOC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (6.61 gallons per hour) by the maximum VOC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC 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: 652.5 lbs VOC/month, 3.92 tons VOC/yr, from the cleanup operations (for emissions units R001, R002, and R004, combined)

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

- c. Emission Limitation: 29.75 tons of VOC per rolling, 12-month period, from coatings usage

Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

- d. Emission Limitation: Annual HAP emissions from emissions units R001, R002, and R004, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 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

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PTI A

Emissions Unit ID: **R001**

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specified in section C.3 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 fo 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 R001, R002, and R004, combined, shall not exceed 17,000 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.1 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - miscellaneous metal parts paint booth #2, equipped with dry filtration (modification of existing emissions unit to revise federally enforceable limitations for VOCs and establish federally enforceable limitations for HAPs)	OAC rule 3745-31-05(A)(3)	31.82 lbs volatile organic compounds (VOC)/hr, from coating operations  652.5 lbs VOC/month, 3.92 tons VOC/yr, from cleanup operations [for emission units R001, R002, and R004, combined]
	OAC rule 3745-31-05(C)	See A.2.a.  29.75 tons of VOC per rolling, 12-month period from the coating operations [for emission units R001, R002, and R004, combined] (See A.2.b.i, B.1 and B.2.)  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units R001, R002, and R004, combined] (See A.2.b.ii.)

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**2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of 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. 29.75 tons VOC per rolling, 12-month period based on coating usage restrictions for emission units R001, R002, and R004, combined, and a coating VOC content restriction (See B.1 and B.2).
  - ii. Annual HAP emissions from emissions units R001, R002, and R004, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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

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

- 2.c** This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Van Wert County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

- 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 R001, R002, and R004, combined, shall not exceed 17,000 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	1417
1-2	2834
1-3	4251
1-4	5668
1-5	7085
1-6	8502
1-7	9919
1-8	11,336
1-9	12,753

1-10	14,170
1-11	15,587
1-12	17,000

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.

2. The VOC content of each coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed for emissions units R001, R002, and R004, combined:
  - a. the name and identification number of each coating employed;
  - b. the VOC 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.1.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the VOC emission rate for each coating employed (C.1.b x C.1.c), in pounds;
  - g. the total VOC emission rate for all the coatings employed (summation of C.1.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 VOC 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 VOC 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

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- 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.

2. The permittee shall collect and record the following each month for cleanup operations in emissions units R001, R002, and R004, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total VOC emissions from all the cleanup materials employed (summation of C.2.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.2.e for each calendar month to date from January to December).
3. The permittee shall collect and record the following HAP information each month for emissions units R001, R002, and R004, 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.3.b x C.3.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.3.d for all coatings and cleanup materials), in lbs;

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- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.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.

**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 VOC emission limitation of 29.75 tons.
  - b. All exceedances of the monthly VOC emission limitation of 652.5 pounds (from the cleanup operations for emissions units R001, R002 and R004, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 17,000 gallons (for emissions units R001, R002, and R004, 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 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R004, combined).

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- 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 R001, R002, and R004, 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 VOC emissions from the cleanup operations (for emissions units R001, R002, and R004, 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: 31.82 lbs VOC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (9.09 gallons per hour) by the maximum VOC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC 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: 652.5 lbs VOC/month, 3.92 tons VOC/yr, from the cleanup operations (for emissions units R001, R002, and R004, combined)

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

- c. Emission Limitation: 29.75 tons of VOC per rolling, 12-month period, from coatings usage

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Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

- d. Emission Limitation: Annual HAP emissions from emissions units R001, R002, and R004, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 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.3 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 fo 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 R001, R002, and R004, combined, shall not exceed 17,000 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.1 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-09(U)(1)(d)
R004 - miscellaneous metal parts paint booth #4, equipped with dry filtration (Modification of PTI #03-13061 issued on January 6, 1999 to revise federally enforceable limitations for VOCs and establish federally enforceable limitations for HAPs)	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(C)	

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Applicable Emissions  
Limitations/Control Measures

41.51 lbs volatile organic compounds (VOC)/hr, from coatings operations

652.5 lbs VOC/month, 3.92 tons VOC/yr, from cleanup operations [for emission units R001, R002, and R004, combined]

See A.2.a.

29.75 tons of VOC per rolling, 12-month period from the coating operations [for emission units R001, R002, and R004, combined] (See A.2.b.i, B.1 and B.2.)

9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units R001, R002, and R004, combined] (See A.2.b.ii.)

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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

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- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(U)(1)(d).
- 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. 29.75 tons VOC per rolling, 12-month period based on coating usage restrictions for emission units R001, R002, and R004, combined, and a coating VOC content restriction (See B.1 and B.2).
  - ii. Annual HAP emissions from emissions units R001, R002, and R004, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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

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- 2.c** This facility is located in Van Wert County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source." Therefore, pursuant to OAC rule 3745-21-07(A), emissions unit R001 is not subject to the requirements of OAC rule 3745-21-07(G).
- 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**

- The maximum annual coating usage rate for emissions units R001, R002, and R004, combined, shall not exceed 17,000 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	1417
1-2	2834
1-3	4251
1-4	5668
1-5	7085
1-6	8502
1-7	9919
1-8	11,336
1-9	12,753
1-10	14,170
1-11	15,587
1-12	17,000

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**

- 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 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 R001, R002, and R004, combined:
- a. the name and identification number of each coating employed;
  - b. the VOC 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.1.c for all coatings);
  - e. the rolling, 12-month coatings usage rates, in gallons;
  - f. the VOC emission rate for each coating employed (C.1.b x C.1.c), in pounds;
  - g. the total VOC emission rate for all the coatings employed (summation of C.1.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 VOC 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 VOC 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,

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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 R001, R002, and R004, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total VOC emissions from all the cleanup materials employed (summation of C.2.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.2.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 R001, R002, and R004, 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.3.b x C.3.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.3.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.3.e for all HAPs for all coatings and cleanup materials), in lbs;

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- 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.

#### 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 VOC emission limitation of 29.75 tons.
  - b. All exceedances of the monthly VOC emission limitation of 652.5 pounds (from the cleanup operations for emissions units R001, R002 and R004, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 17,000 gallons (for emissions units R001, R002, and R004, 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 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R004, 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 R001, R002, and R004, combined).

These reports shall be submitted in accordance with the general terms and

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conditions of this permit.

3. The permittee shall submit annual reports that summarize the total annual actual VOC emissions from the cleanup operations (for emissions units R001, R002, and R004 ,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: 41.51 lbs VOC/hr, from coatings usage

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (11.86 gallons per hour) by the maximum VOC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC 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: 652.5 lbs VOC/month, 3.92 tons VOC/yr, from the cleanup operations (for emissions units R001, R002, and R004, combined)

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

- c. Emission Limitation: 29.75 tons of VOC per rolling, 12-month period, from coatings usage

Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

- d. Emission Limitation: Annual HAP emissions from emissions units R001, R002, and R004, combined, shall not exceed 9.90 tons per rolling, 12-month period for

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any individual HAP or 24.90 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.3 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 fo 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 R001, R002, and R004, combined, shall not exceed 17,000 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.1 of this permit.

**F. Miscellaneous Requirements**

None