State of Ohio Environmental Protection Agency

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

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

Application No: 03-17225
Fac ID: 0387000031
DATE: 12/5/2006

Modine Manufacturing Company
Ron Nixon
615 Bierley Road
Pemberville, OH 43450

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/5/2006**
Terms and Conditions	**Effective Date: 12/5/2006**

FINAL PERMIT TO INSTALL 03-17225

Application Number:	03-17225
Facility ID:	0387000031
Permit Fee:	**$400**
Name of Facility:	Modine Manufacturing Company
Person to Contact:	Ron Nixon
Address:	615 Bierley Road Pemberville, OH 43450

Location of proposed air contaminant source(s) [emissions unit(s)]:
615 Bierley Road
Pemberville, **Ohio**

Description of proposed emissions unit(s):
Modification of 4 coating operations at the facility to correct current permit deficiencies and establish federally enforceable organic compound and hazardous air pollutant limitations.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year

Volatile Organic Compounds (VOC)	44.16
Individual Hazardous Air Pollutants (HAPs)	9.90
Combined HAPs	24.90

Issued: 12/5/2006

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 - (K004) - oil cooler color/prime paint booth 1 with water curtain/dry filtration (modification of PTI #03-13326 issued on 4/26/00 to establish HAP and cleanup limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	17.50 lbs volatile organic compounds (VOC)/hr from coating operations 150 lbs VOC/month, 0.9 ton VOC/yr, from cleanup operations [for emission units K004, K005, K006, and K007 combined]
OAC rule 3745-31-05(C)	17.84 tons of VOC per rolling, 12-month period from the coating operations [for emission units K004 and K005 combined] (See A.2.b.i and B.1) 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K004, K005, K006, and K007 combined] (See A.2.b.ii.)
OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating

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) and OAC rule 3745-21-09(U)(1)(c).

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Title V and Maximum Achievable Control Technology (MACT) regulations and establish the facility as a minor

source for non-attainment New Source Review:

i. 17.84 tons VOC per rolling, 12-month period based on a coating usage restriction for emission units K004 and K005 combined (See B.1).

ii. Annual HAP emissions from emission units K004, K005, K006, and K007 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):

Month(s)	Individual HAP	Combined HAPs
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.

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 K004 and K005 combined, shall not exceed 10,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates. The above coating usage restriction for K004 and K005 was established in PTI #03-13326 issued on April 26, 2000 and as such there are records to demonstrate compliance with the rolling 12-month restriction upon operation under the provisions of this permit.

C. Monitoring and/or Recordkeeping 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 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 K004 and K005 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.2.c for all coatings);

   e. the rolling, 12-month coatings usage rates, in gallons;

   f. the VOC emission rate for each coating employed (C.2.b x C.2.c), in pounds;

   g. the total VOC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;

   h. the rolling, 12-month VOC emission rates, in tons.

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 in emissions units K004, K005, K006, and K007 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.3.b x C.3.c);

   e. the total VOC 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 K004, K005, K006, and K007 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.

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 17.84 tons (from the coating operations for emissions units K004 and K005 combined).

   b. All exceedances of the monthly VOC emission limitation of 150 pounds (from the cleanup operations for emissions units K004, K005, K006, and K007 combined).

   c. All exceedances of the rolling, 12-month coatings usage restriction of 10,000 gallons (for emissions units K004 and K005 combined).

   d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K004, K005, K006, and K007 combined).

   e. 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 K004, K005, K006, and K007 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 K004, K005, K006, and K007 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: 17.50 lbs VOC/hr, from coatings operations

      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 (5 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: 150 lbs VOC/month, 0.9 ton VOC/yr, from the cleanup operations (for emissions units K004, K005, K006, and K007 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.3 of this permit.

   c. Emission Limitation: 17.84 tons of VOC per rolling, 12-month period, from coating operations (from the coating operations for emissions units K004 and K005 combined)

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

   d. Emission Limitation: Annual HAP emissions from emissions units K004, K005, K006, and K007 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.4 of this permit.

e. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, 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 for this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings materials.

f. Emission Limitation: The maximum annual coatings usage rate for emissions units K004 and K005 combined, shall not exceed 10,000 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.2 of this permit.

Emissions Unit ID: **K004**

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: 12/5/2006

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 - (K005) - oil cooler color/prime paint booth 2 with water curtain/dry filtration (modification of PTI #03-13326 issued on 4/26/00 to establish HAP and cleanup limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	17.50 lbs volatile organic compounds (VOC)/hr from coating operations 150 lbs VOC/month, 0.9 ton VOC/yr, from cleanup operations [for emission units K004, K005, K006, and K007 combined]
OAC rule 3745-31-05(C)	17.84 tons of VOC per rolling, 12-month period from the coating operations [for emission units K004 and K005 combined] (See A.2.b.i and B.1) 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K004, K005, K006, and K007 combined] (See A.2.b.ii.)
OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating

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) and OAC rule 3745-21-09(U)(1)(c).

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Title V and Maximum Achievable

Control Technology (MACT) regulations and establish the facility as a minor source for non-attainment New Source Review:

i. 17.84 tons VOC per rolling, 12-month period based on a coating usage restriction for emission units K004 and K005 combined (See B.1).

ii. Annual HAP emissions from emission units K004, K005, K006, and K007 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):

Month(s)	Individual HAP	Combined HAPs
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.

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 K004 and K005 combined, shall not exceed 10,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates. The above coating usage restriction for K004 and K005 was established in PTI #03-13326 issued on April 26, 2000 and as such there are records to demonstrate compliance with the rolling 12-month restriction upon operation under the provisions of this permit.

C. Monitoring and/or Recordkeeping 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 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 K004 and K005 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.2.c for all coatings);

   e. the rolling, 12-month coatings usage rates, in gallons;

   f. the VOC emission rate for each coating employed (C.2.b x C.2.c), in pounds;

   g. the total VOC emission rate for all the coatings employed (summation of C.2.f for all coatings.), in pounds or tons;

   h. the rolling, 12-month VOC emission rates, in tons.

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 in emissions units K004, K005, K006, and K007 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.3.b x C.3.c);

   e. the total VOC 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 K004, K005, K006, and K007 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.

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 17.84 tons (from the coating operations for emissions units K004 and K005 combined).

   b. All exceedances of the monthly VOC emission limitation of 150 pounds (from the cleanup operations for emissions units K004, K005, K006, and K007 combined).

   c. All exceedances of the rolling, 12-month coatings usage restriction of 10,000 gallons (for emissions units K004 and K005 combined).

   d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K004, K005, K006, and K007 combined).

   e. 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 K004, K005, K006, and K007 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 K004, K005, K006, and K007 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: 17.50 lbs VOC/hr, from coatings operations

      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 (5 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: 150 lbs VOC/month, 0.9 ton VOC/yr, from the cleanup operations (for emissions units K004, K005, K006, and K007 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.3 of this permit.

   c. Emission Limitation: 17.84 tons of VOC per rolling, 12-month period, from coating operations (from the coating operations for emissions units K004 and K005 combined)

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

   d. Emission Limitation: Annual HAP emissions from emissions units K004, K005, K006, and K007 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.4 of this permit.

e. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, 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 materials.

f. Emission Limitation: The maximum annual coatings usage rate for emissions units K004 and K005 combined, shall not exceed 10,000 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.2 of this permit.

Emissions Unit ID: **K005**

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: 12/5/2006

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 - (K006) - radiator coating line consisting of 3 paint spray booths with water curtain/dry filtration (modification of PTI #03-13444 issued on 2/11/03 to establish HAP and cleanup limitations and revise VOC limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	16.40 lbs volatile organic compounds (VOC)/hr from coating operations 150 lbs VOC/month, 0.9 ton VOC/yr, from cleanup operations [for emission units K004, K005, K006, and K007 combined]
OAC rule 3745-31-05(C)	25.42 tons of VOC per rolling, 12-month period from the coating operations [for emission units K006 and K007 combined] (See A.2.b.i and B.1) 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K004, K005, K006, and K007 combined] (See A.2.b.ii.)
OAC rule 3745-21-09(U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding two hundred degrees Fahrenheit.

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) and OAC rule 3745-21-09(U)(1)(d).

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Title V and Maximum Achievable Control Technology (MACT) regulations and establish the facility as a minor source for non-attainment New Source Review:

i. 28.60 tons VOC per rolling, 12-month period based on a coating usage restriction for emission units K006 and K007 combined, and a coating VOC content restriction (See B.1 and B.2).

ii. Annual HAP emissions from emission units K004, K005, K006, and K007 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):

Month(s)	Individual HAP	Combined HAPs
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.

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 K006 and K007 combined, shall not exceed 62,000 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	5167
1-2	10334
1-3	15501
1-4	20668
1-5	25835
1-6	31002
1-7	36169
1-8	41336
1-9	46503
1-10	51670
1-11	56837
1-12	62000

   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 0.82 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 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 K006 and K007 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.2.c for all coatings);

e. the rolling, 12-month coatings usage rates, in gallons;

f. the VOC emission rate for each coating employed (C.2.b x C.2.c), in pounds;

g. the total VOC 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 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.

3. The permittee shall collect and record the following each month for cleanup operations in emissions units K004, K005, K006, and K007 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.3.b x C.3.c);

   e. the total VOC 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 K004, K005, K006, and K007 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.

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 coating content restriction of 0.82 lbs VOC/gallon, as applied.

b. All exceedances of the rolling, 12-month VOC emission limitation of 25.42 tons (from the coating operations for emissions units K006 and K007 combined)

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c. All exceedances of the monthly VOC emission limitation of 652.5 pounds (from the cleanup operations for emissions units K004, K005, K006, and K007 combined).

d. All exceedances of the rolling, 12-month coatings usage restriction of 62,000 gallons (for emissions units K006 and K007 combined).

e. 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.

f. 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 K004, K005, K006, and K007 combined).

g. 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 K004, K005, K006, and K007 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 K004, K005, K006, and K007 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: 16.40 lbs VOC/hr, from coatings operations

      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 (20 gallons per hour) by the maximum VOC content of all the coatings (0.82 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: 150 lbs VOC/month, 0.9 ton VOC/yr, from the cleanup operations (for emissions units K004, K005, K006, and K007 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.3 of this permit.

   c. Emission Limitation: 25.42 tons of VOC per rolling, 12-month period, from coating operations (from the coating operations for emissions units K004 and K005 combined)

      Applicable Compliance Method: Compliance with the annual allowable VOC

emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.

d. Emission Limitation: Annual HAP emissions from emissions units K004, K005, K006, and K007 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.4 of this permit.

e. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, 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 materials.

f. Emission Limitation: 0.82 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 materials.

g. Emission Limitation: The maximum annual coatings usage rate for emissions units K006 and K007 combined, shall not exceed 62,000 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.2 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as

defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: 12/5/2006

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 - (K007) - service parts spray booth with water curtain/dry filtration (modification of PTI #03-13444 issued on 2/11/03 to establish HAP and cleanup limitations and revise VOC limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.82 lbs volatile organic compounds (VOC)/hr, 3.59 tons VOC/yr from coating operations 150 lbs VOC/month, 0.9 ton VOC/yr, from cleanup operations [for emission units K004, K005, K006, and K007 combined]
OAC rule 3745-31-05(C)	25.42 tons of VOC per rolling, 12-month period from the coating operations [for emission units K006 and K007 combined] (See A.2.b.i and B.1) 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K004, K005, K006, and K007 combined] (See A.2.b.ii.)
OAC rule 3745-21-09(U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding two hundred degrees Fahrenheit.

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) and OAC rule 3745-21-09(U)(1)(d).

Emissions Unit ID: **K007**

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Title V and Maximum Achievable Control Technology (MACT) regulations and establish the facility as a minor source for non-attainment New Source Review:

i. 28.60 tons VOC per rolling, 12-month period based on a coating usage restriction for emission units K006 and K007 combined, and a coating VOC content restriction (See B.1 and B.2).

ii. Annual HAP emissions from emission units K004, K005, K006, and K007 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):

Month(s)	Individual HAP	Combined HAPs
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.

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 K006 and K007 combined, shall not exceed 62,000 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	5167
1-2	10334
1-3	15501
1-4	20668
1-5	25835
1-6	31002
1-7	36169
1-8	41336
1-9	46503
1-10	51670
1-11	56837
1-12	62000

   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 0.82 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 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 K006 and K007 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.2.c for all coatings);

e. the rolling, 12-month coatings usage rates, in gallons;

f. the VOC emission rate for each coating employed (C.2.b x C.2.c), in pounds;

g. the total VOC 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 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.

3. The permittee shall collect and record the following each month for cleanup operations in emissions units K004, K005, K006, and K007 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.3.b x C.3.c);

   e. the total VOC 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 K004, K005, K006, and K007 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.

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 coating content restriction of 0.82 lbs VOC/gallon, as applied.

   b. All exceedances of the rolling, 12-month VOC emission limitation of 25.42 tons (from the coating operations for emissions units K006 and K007 combined)

.

   c. All exceedances of the monthly VOC emission limitation of 652.5 pounds (from the cleanup operations for emissions units K004, K005, K006, and K007 combined).

   d. All exceedances of the rolling, 12-month coatings usage restriction of 62,000 gallons (for emissions units K006 and K007 combined).

   e. 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.

   f. 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 K004, K005, K006, and K007 combined).

   g. 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 K004, K005, K006, and K007 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 K004, K005, K006, and K007 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: 0.82 lbs VOC/hr, 3.59 tons VOC/yr from coatings operations

      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 (1 gallons per hour) by the maximum VOC content of all the coatings (0.82 pounds per gallon).

      The annual allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly potential to emit (0.82 lbs/hr) , a maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

      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: 150 lbs VOC/month, 0.9 ton VOC/yr, from the cleanup operations (for emissions units K004, K005, K006, and K007 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.3 of this permit.

   c. Emission Limitation: 25.42 tons of VOC per rolling, 12-month period, from

coating operations (from the coating operations for emissions units K004 and K005 combined)

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

d. Emission Limitation: Annual HAP emissions from emissions units K004, K005, K006, and K007 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.4 of this permit.

e. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, 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 materials.

f. Emission Limitation: 0.82 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 materials.

g. Emission Limitation: The maximum annual coatings usage rate for emissions units K006 and K007 combined, shall not exceed 62,000 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.2 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.