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: 03-16015

DATE: 12/26/2003

The D.S. Brown Company
Gina Rejent
300 E. Cherry Street
North Baltimore, OH 45872

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

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

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

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

Sincerely,

Michael W. Ahern

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

CC: USEPA **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/26/2003**
Terms and Conditions	**Effective Date: 12/26/2003**

FINAL PERMIT TO INSTALL 03-16015

Application Number:	03-16015
APS Premise Number:	0387000118
Permit Fee:	**$400**
Name of Facility:	The D.S. Brown Company
Person to Contact:	Gina Rejent
Address:	300 E. Cherry Street North Baltimore, OH 45872

Location of proposed air contaminant source(s) [emissions unit(s)]:
300 E. Cherry Street
North Baltimore, **Ohio**

Description of proposed emissions unit(s):
metal parts adhesives coating line (2 dip tanks in series - conveyorized); and, metal parts cold cleaner - MEK - 115 gallons (conveyorized).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	9.62

Emissions Unit ID: **K005**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 - metal parts adhesives coating line (2 dip tanks in series - conveyorized)	OAC rule 3745-31-05 (C)	Emissions of hazardous air pollutants (HAPs) from emissions units K001 - K005 and L001 shall not exceed 9.9 tons per year for any individual HAP or 24.9 tons per year for all HAPs combined (See A.2.a)
	OAC rule 3745-31-05 (A)(3)	36.8 lbs of volatile organic compound (VOC)/hour; 6.96 tons of VOC /year See A.2.b
	OAC rule 3745-21-09 (U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage never exceeding 10 gallons in any one day (See A.2.c)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding Title V:

Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 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	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	9.9	24.9

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.b 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)(2)(e)(iii).

2.c This emissions unit is exempt from the compliant coating requirements of OAC rule 3745-21-09(U)(1) provided coating usage never exceeds 10 gallons in any one day. If coating usage exceeds 10 gallons in any one day, the emissions unit will no longer qualify for the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) and the permittee will be required to comply with the requirements of OAC rule 3745-21-09(U)(1). The requirements of OAC rule 3745-21-09(U)(1) will be become applicable to this emissions unit on the day coating usage exceeds 10 gallons and will continue to be applicable even on following days where coating usage is less than 10 gallons.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

   a. the name and identification number of each coating/make-up solvent employed;

   b. the VOC content of each coating/make-up solvent, as applied, in pounds per gallon;

   c. the volume, in gallons, of each coating/make-up solvent employed; and

   d. the total volume, in gallons, of all of the coatings/make-up solvents employed.

2. The permittee shall (in conjunction with the information required in C.1) collect and record the following information each month for purposes of determining annual VOC emissions:

   a. the total VOC emissions from each coating/make-up solvent employed, in tons per month (C.1.b x C.1.c);

   b. the total VOC emissions from all coatings/make-up solvents employed, in tons per month (summation of C.2.a)

   c. the annual year to date VOC emissions from coating/make-up solvent usage, in tons per year (sum of b for each calendar month to date from January to December)

3. The permittee shall collect and record the following information for HAP emissions each month, for this emissions unit:

   a. the company identification of each coating/make-up solvent employed;

   b. the amount of each individual HAP (lb/gallon) in each coating/make-up solvent, as applied;

   c. the number of gallons of each coating/make-up solvent employed;

   d. the emission rate for each individual HAP from each coating/make-up solvent employed,

(b x c) for each individual HAP, in lbs/month;

e. the total emission rate for each individual HAP from all coatings/make-up solvents employed (summation of d for each individual HAP), in lbs/month;

f. the total HAP emission rate for all HAPs combined from all coatings/make-up solvents employed (summation of e for all HAPs), in lbs/month;

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

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

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

4. The permittee shall (in conjunction with the information required in C.3) collect and record the following information each month for emissions units K001 - K005 and L001 combined:

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

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

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

Pollutant: Xylene
TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 6.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1303
MAGLC (ug/m3): 10,300

Pollutant: Methyl Isobutyl Ketone
TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 4.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 961
MAGLC (ug/m3): 4,880

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

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

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the general terms and conditions of this permit.

3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual VOC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. 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. <u>Emission Limitation</u>
   36.8 lbs of VOC/hour

   <u>Applicable Compliance Method</u>
   The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

   * The potential to emit is based on a maximum primer usage rate of 2 gallons per hour and a maximum VOC content of 5.97 pounds per gallon, and a maximum adhesive usage rate of 4 gallons per hour and a maximum VOC content of 6.20 pounds per gallon.

b. Emission Limitation
6.96 tons of VOC/year

Applicable Compliance Method
Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

c. Emission Limitation
Not to exceed 9.9 tons per rolling 12-month period of any individual HAP or 24.9 tons per rolling 12-month period of any combination of HAPs (from emissions unit K001-K005 and L001 combined)

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

d. Emission Limitation
VOC emission exemption, based on maximum daily coating usage never exceeding 10 gallons in any one day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements in section C.1.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coating materials employed.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
L001 - metal parts cold cleaner - MEK - 115 gallons (conveyorized - single 'one-at-a-time' dip).	OAC rule 3745-31-05 (C)	Emissions of hazardous air pollutants (HAPs) from emissions units K001 - K005 and L001 shall not exceed 9.9 tons per year for any individual HAP or 24.9 tons per year for all HAPs combined (See A.2.a)
	OAC rule 3745-31-05 (A)(3)	447 lbs of VOC/month; 2.68 tons of VOC /year See A.2.b
	OAC 3745-21-09 (O)	Operational Restrictions, Work Practice Requirements (See B.1, B.2, B.3, and B.4)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding Title V:

Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 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	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	9.9	24.9

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.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (O)(2).

B. Operational Restrictions

1. The cold cleaner shall be equipped with a cover that shall be designed and constructed so that it can be easily operated with one hand.
[OAC 3745-21-09(O)(2)(a)(i)]

2. The conveyor for the cold cleaner shall be equipped to provide for draining of the cleaned parts. (Note: An internal type drainage device cannot fit into the cleaning system.)
[OAC 3745-21-09(O)(2)(b)]

3. The cold cleaner shall have a freeboard ratio greater than or equal to 0.7. "Freeboard ratio" means the freeboard height divided by the width of the degreaser air/solvent area.
[OAC 3745-21-09(O)(2)(c)(i), and 21-01(G)(4)]

4. The permittee shall operate and maintain the cold cleaner in accordance with the following practices to minimize solvent evaporation from the unit:

   a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

   b. Store waste solvent in covered containers.

   c. Close the cover whenever parts are not being handled in the cleaner.

   d. Drain the cleaned parts until dripping ceases.

   e. Clean only materials that are neither porous nor absorbent.

   [OAC 3745-21-09(O)(2)(d)]

C. Monitoring and/or Recordkeeping Requirements

1. Any owner or operator of a solvent metal cleaning operation shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the director upon verbal or written request: the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit.
[OAC 3745-21-09(O)(5)]

2. The permittee shall collect and record the following information each month regarding VOC emissions from the solvent cleaning operations for this emissions unit:

   a. The company identification for each solvent employed;

   b. The VOC content of each solvent employed, in pounds/gallon;

   c. The number of gallons of each solvent employed;

   d. The VOC emissions rate for each solvent (b x c) in pounds/month; and

e. The total VOC emissions for all solvents (summation of d), in pounds/month.

NOTE: The permittee may calculate the monthly VOC emission rate in accordance with the following formula if waste solvent is sent off-site for reclamation/disposal:

Emission rate = (the total gallons of solvent used x the solvent density) - (the total gallons of waste solvent shipped offsite x the average solvent content of the waste solvent).

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

   a. the company identification of each coating/make-up solvent employed;

   b. the amount of each individual HAP (lb/gallon) in each coating/make-up solvent, as applied;

   c. the number of gallons of each coating/make-up solvent employed;

   d. the emission rate for each individual HAP from each coating/make-up solvent employed, (b x c) for each individual HAP, in lbs/month;

   e. the total emission rate for each individual HAP from all coatings/make-up solvents employed (summation of d for each individual HAP), in lbs/month;

   f. the total HAP emission rate for all HAPs combined from all coatings/make-up solvents employed (summation of e for all HAPs), in lbs/month;

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

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

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

4. The permittee shall (in conjunction with the information required in C.3) collect and record the following information each month for emissions units K001 - K005 and L001 combined:

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

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

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

   Pollutant: Methyl Ethyl Ketone
   TLV (ug/m3): 590,000
   Maximum Hourly Emission Rate (lbs/hr): 27.0
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5540
   MAGLC (ug/m3): 14,050

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the monthly VOC emission limitation specified in section A.1. These reports shall be submitted in accordance with the general terms and conditions of this permit.

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. <u>Emission Limitation</u>
   447 lbs of VOC/month
   2.68 tons of VOC/year

   <u>Applicable Compliance Method</u>

Compliance shall be based upon the record keeping requirements in section C.2.

The annual allowable OC limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, if compliance is shown with the monthly limitation, compliance is shown with the annual limitation**.**

F. Miscellaneous Requirements

None