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Facility Name: **Sajar Plastics**

Application Number: **02-2102**

Date: **March 3, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Sajar Plastics** located in **Geauga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

			R011
		R010	
Ohio	R009		
EPA			
Source R008			
<u>Number</u>			
R007			

R009 cont'd

R010 cont'd

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R012

R013

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R013 cont'd

R014

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R014 cont'd

R015

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R016

Source Identification Description

Paint Spray Booth #44A

Paint Spray Booth #44 B

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Paint Spray Booth #45

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Paint Spray Booth #46

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Paint Spray Booth #47

Paint Spray Booth #48

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Paint Spray Booth #49

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Paint Spray Booth #50A

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Paint Spray Booth #50B

Paint Spray Booth #51

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BAT
Determination

Compliance with Applicable Rules & Air Toxics Policy

Compliance with Applicable Rules & Air Toxics Policy

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Compliance with Applicable Rules & Air Toxics Policy

Applicable Federal &
OAC Rules

3745-31-05

3745-21-07
(G) (2)

3745-17-11

3745-17-07

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40 CFR 60 Subpart TTT

3745-31-05

3745-21-07
(G) (2)

3745-17-11

3745-17-07

40 CFR 60 Subpart TTT

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3745-31-05

3745-21-07
(G) (2)

3745-17-11

3745-17-07

40 CFR 60 Subpart TTT

3745-31-05

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3745-17-11

3745-17-07

40 CFR 60 Subpart TTT

3745-31-05

3745-21-07
(G) (2)

3745-17-11

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3745-31-05

3745-21-07

(G) (2)

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3745-21-07

(G) (2)

3745-17-11

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40 CFR 60 Subpart TTT

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3745-17-07

40 CFR 60 Subpart TTT

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3745-21-07
(G) (2)

3745-17-11

3745-17-07

40 CFR 60 Subpart TTT

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3745-31-05

3745-21-07
(G) (2)

3745-17-11

3745-17-07

40 CFR 60 Subpart TTT

Permit Allowable Mass Emissions and/or Control/Usage
Requirements

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650
lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or
color coating VOC-2.3 Kilograms per liter of coating solids applied,

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when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied, when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied, when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied, when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

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* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied, when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied, when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied, when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650 lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or color coating VOC-2.3 Kilograms per liter of coating solids applied,

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when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650
lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or
color coating VOC-2.3 Kilograms per liter of coating solids applied,
when texture or touch-up coating

Total HAPs-4,150 lbs/month facility-wide Individual HAP- 1,650
lbs/month facility-wide

* OC-8 lbs/hour, 40 lbs/day & 7.3 TPY

* PM - 0.551 lb/hr & 2.41 TPY

* 20% opacity as a six-minute average, except as provided by rule

VOC-1.5 Kilograms per liter of coating solids applied, when prime or
color coating VOC-2.3 Kilograms per liter of coating solids applied,
when texture or touch-up coating

* Equivalent to OAC 3745-31-05 limitation.

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SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	73.0
HAPs (total)	24.9
HAP (individual)	9.9
PM	24.1

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
R007-R016	Paint Spray Booths	TTT

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Permit Management Unit
 P.O. Box 163669

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Columbus, OH 43216-3669

and **Ohio EPA Northeast District Office**
2110 E. Aurora Road
Twinsburg, Ohio 44087

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. INTRODUCTION:

This facility is located in the Village of Middlefield in Geauga County. The facility has 10 paint spray booths, three of which are tributary to a low-temperature infra-red drying oven. The booths coat plastic business machine parts. The applicant has applied to permit these spray booths, most or all of which were installed without obtaining a permit to install. At one time the facility was permitted for 7 spray booths, 5 of which were removed from the facility. The remaining two may be included in this application or may have also been removed from the facility, records are too sketchy to be sure. The facility has applied to be a synthetic minor facility and to demonstrate the synthetic minor status by means of record keeping.

B. OPERATIONAL RESTRICTIONS:

1. The permittee shall not employ more than 8 pounds OC per hour and 40 pounds OC per day per booth.
2. The permittee shall not employ more than 1,650 pounds of any individual HAP per month in this facility.
3. The permittee shall not employ more than 4,150 pounds of all HAPs per month in this facility.

C. EMISSION LIMITATIONS AND CONTROL REQUIREMENTS:

1. Pursuant to 40 CFR 60.720, Subpart TTT of the New Source Performance Standards, the permittee shall not emit more than 1.5 kilograms of VOC per liter of coating solids applied when applying prime coating or color coating. The permittee shall not emit more than 2.3 kilograms per liter of coating solids applied, when texture coating or for touch-up.
2. This facility shall not emit more than 0.551 pound PM per hour per spray booth.

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3. Each spray booth is limited to a maximum of 20% opacity as a six-minute average, except as provided by rule.

D. MONITORING AND RECORD KEEPING REQUIREMENTS:

1. The permittee shall collect and record the following information each month to determine HAP emissions:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b.);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions from each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b. times d. for each coating and the sum of f. times h. for each cleanup material); and,

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- j. the total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pound or tons per rolling 12 month period (the sum of c. times d. for each coating plus the sum of g. times h. for each cleanup material).

¹A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect the following records monthly for each emissions unit:
 - a. the identification and volume of each coating used;
 - b. the composition of coatings received; and,
 - c. the mass of VOC in diluent(s) employed.
3. If any individual coating used has a VOC content (kg VOC/l of solids) which does not comply with the requirements of Subpart TTT (per the initial compliance test), the permittee shall collect the following records:
 - a. density of each coating as received (kilograms per liter);
 - b. density of each diluent VOC (kilograms per liter);
 - c. the volume of coating solids consumed (liters);
 - d. the transfer efficiency for each type of application equipment used at a coating operation

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- (fraction);
 - e. the proportion of solids in each coating, as received (fraction); and,
 - f. the proportion of VOC's in each coating, as received (fraction by weight).
4. The permittee shall collect and record the following information for the purpose of determining daily OC emissions:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - e. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons; and,
 - f. the number of hours each day that the emissions unit operated.

E. REPORTING REQUIREMENTS

- 1. The permittee shall notify the Director of any monthly record showing any deviation from the following:
 - a. an identification of all months during which the Hazardous Air Pollutant (HAP) limitation(s) were exceeded;
 - b. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds per month; and,

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- c. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds per month.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all the Exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record showing a deviation from the daily OC limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.

F. TESTING REQUIREMENTS:

Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1. EMISSION LIMITATION:
1,650 pounds of any individual HAP per month and 4,150 pounds of all HAPs per month

APPLICABLE COMPLIANCE METHOD:

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Monthly RECORD KEEPING of coating and organic compound content of each coating. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the volatile organic compound contents and HAP contents of the coatings.

2. EMISSION LIMITATION:
8 pounds OC per hour, 40 pounds OC per day, and 7.3 tons OC per year per booth

APPLICABLE COMPLIANCE METHOD:

Daily RECORD KEEPING of coatings and cleanup materials and organic compound content of same. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents and HAP contents of the coatings and cleanup materials.

3. EMISSION LIMITATION:
0.551 pound PM per hour and 2.41 tons per year

APPLICABLE COMPLIANCE METHOD:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

4. EMISSION LIMITATION:
20% opacity as a six-minute average, except as provided

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by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1) [RM 9]

5. EMISSION LIMITATION:
1.5 kilograms of VOC per liter of coating solids applied when applying prime coating or color coating and 2.3 kilograms per liter of coating solids applied, when texture coating or for touch-up

APPLICABLE COMPLIANCE METHOD:

USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of each coating. This may be performed by the permittee or the supplier, with record of same retained by permittee. If any individual coating was applied during the month which was demonstrated to not comply with the applicable requirement in Subpart TTT in the initial compliance test, the following shall be used to demonstrate compliance:

- a. Calculate the mass of VOC's used (M):
$$M_o + M_d = L_{ci} \times D_{ci} \times W_{oi} + \dots L_{dj} \times D_{dj}$$
- b. Calculate the total volume of coating solids consumed L_s :
$$L_s = L_{ci} \times V_{si}$$
- c. Calculate the volume-weighted average mass of VOC's emitted per unit volume of coating solids applied:
$$N = \frac{M_o + M_d}{L_s \times T_{ave}} \quad \text{where}$$

D_c = the density of each coating as received (kilograms per liter);

D_d = the density of each diluent VOC (kilograms per liter);

L_c = the volume of each coating consumed, as received (liters);

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L_d = the volume of each diluent VOC added to coatings (liters);

L_s = the volume of coating solids consumed (liters);

M_d = the mass of diluent VOC's consumed (kilograms);

M_o = the mass of VOC's in coatings consumed, as received (kilograms);

N = the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter);

T = the transfer efficiency for each type of application equipment used at a coating operation (fraction);

T_{ave} = the volume-weighted average transfer efficiency for a coating operation (fraction);

V_s = the proportion of solids in each coating, as received (fraction by volume); and

W_o = the proportion of VOC's in each coating, as received (fraction by weight).

G. MISCELLANEOUS REQUIREMENTS:

The permittee shall conduct an initial compliance test, as specified in 40 CFR 60, Subpart TTT, for any new ink or coating employed in the facility. Records of same shall be maintained on the premises and made available to the any representative of the Director during normal business hours.