

Facility ID: 0387000031 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit K004](#)
- [Go to Part II for Emissions Unit K005](#)
- [Go to Part II for Emissions Unit K006](#)
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Facility ID: 0387000031 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
oil cooler color/prime paint booth 1 - with water curtain /dry filtration	OAC rule 3745-31-05(A)(3) (PTI 03-17225 issued December 5, 2006)	17.5 lbs volatile organic compounds (VOC) /hr, from coating operations
	OAC rule 3745-31-05(C)	150 lbs VOC /month, 0.9 ton VOC /yr, from cleanup operations [for emission units K004, K005, K006, and K007 combined]
		17.8 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 24.9 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
	ORC 3704.03(F) OAC rule 3745-114-01	See C.5 through C.8.

2. Additional Terms and Conditions

- (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). The Permit to Install (PTI) 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. 17.8 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 24.9 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 the PTI, 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 the PTI, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

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 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 Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in 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 CVOC.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; and
 - 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 the PTI, 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 the PTI, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: methanol
 TLV (ug/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 35.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1360
 MAGLC (ug/m3): 6240
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 (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- 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.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
8. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All exceedances of the rolling, 12-month VOC emission limitation of 17.8 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 24.9 tons, respectively (for emissions units K004, K005, K006, and K007 combined).
- e. for the first 12 calendar months of operation following the issuance of the PTI, 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:
 Emission Limitation:
 17.5 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).
 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.
 Emission Limitation:
 17.8 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.
 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 24.9 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.
2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating or cleaning materials.

F. Miscellaneous Requirements

1. None

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Facility ID: 0387000031 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
oil cooler color/prime paint booth 2 - with water curtain /dry filtration	OAC rule 3745-31-05(A)(3) (PTI 03-17225 issued December 5, 2006)	17.5 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

OAC rule 3745-31-05(C)	K007 combined] 17.8 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)
OAC rule 3745-21-09(U)(1)(c)	9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K004, K005, K006, and K007 combined] (See A.2.b.ii.)
ORC 3704.03(F) OAC rule 3745-114-01	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating See C.5 through C.8.

2. Additional Terms and Conditions

(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). The Permit to Install (PTI) 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. 17.8 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 24.9 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 the PTI, 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 the PTI, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

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 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 Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in 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 CVOC.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; and
- 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 the PTI, 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 the PTI, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: methanol
 TLV (ug/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 35.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1360
 MAGLC (ug/m3): 6240
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 (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- 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.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be

required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

D. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month VOC emission limitation of 17.8 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 24.9 tons, respectively (for emissions units K004, K005, K006, and K007 combined).
 - e. for the first 12 calendar months of operation following the issuance of the PTI, 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:

Emission Limitation:
17.5 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).

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.

Emission Limitation:
17.8 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.

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 24.9 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.
2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating or cleaning materials.

F. Miscellaneous Requirements

1. None

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Facility ID: 0387000031 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
radiator coating line consisting of 3 paint spray booths - with water curtain /dry filtration	OAC rule 3745-31-05(A)(3) (PTI 03-17225 issued December 5, 2006)	16.4 lbs volatile organic compounds (VOC) /hr, from coating operations
	OAC rule 3745-31-05(C)	150 lbs VOC /month, 0.9 ton VOC /yr, from cleanup operations [for emission units K004, K005, K006, and K007 combined] 25.4 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)
	OAC rule 3745-21-09(U)(1)(c)	9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K004, K005, K006, and K007 combined] (See A.2.b.ii.) 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating

2. Additional Terms and Conditions

- (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).
The Permit to Install (PTI) 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. 25.4 tons VOC per rolling, 12-month period based on a coating usage restriction for emission units K006 and K007 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 24.9 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 the PTI, 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 the PTI, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

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. A prior coating usage restriction of 60,000 gallons was established for K006 and K007 in PTI 03-13444 issued February 11, 2003, and as such there are records to demonstrate compliance with the rolling 12-month restriction upon operation under the provisions of this permit.
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 Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in 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 CVOC.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; and
 - 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 the PTI, 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 the PTI, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: butyl cellosolve
 TLV (ug/m3): 121
 Maximum Hourly Emission Rate (lbs/hr): 16.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 178
 MAGLC (ug/m3): 2880
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 (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- 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.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
8. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All exceedances of the rolling, 12-month VOC emission limitation of 25.4 tons (from the coating operations for emissions units K006 and K007 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 62,000 gallons (for emissions units K006 and K007 combined).
- d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.9 tons, respectively (for emissions units K004, K005, K006, and K007 combined).
- e. for the first 12 calendar months of operation following the issuance of the PTI, 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).
- f. All exceedances of the coating content restriction of 0.82 lbs VOC/gallon, as applied.
- 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:
 Emission Limitation:
 16.4 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).
 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.
 Emission Limitation:
 25.4 tons of VOC per rolling, 12-month period, from coating operations (from the coating operations for emissions units K006 and K007 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.
 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 24.9 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.
 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 of this permit.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating or cleaning materials.

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0387000031 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
service parts spray booth - with water curtain /dry filtration	OAC rule 3745-31-05(A)(3) (PTI 03-17225 issued December 5, 2006)	0.82 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)	25.4 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 24.9 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

(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). The Permit to Install (PTI) 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. 25.4 tons VOC per rolling, 12-month period based on a coating usage restriction for emission units K006 and K007 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 24.9 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 the PTI, 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 the PTI, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

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. A prior coating usage restriction of 60,000 gallons was established for K006 and K007 in PTI 03-13444 issued February 11, 2003, and as such there are records to demonstrate compliance with the rolling 12-month restriction upon operation under the provisions of this permit.
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 Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in 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 CVOC.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; and
- 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:
- the name and identification of each cleanup material employed;
 - the VOC content of each cleanup material employed, in pounds per gallon;
 - the number of gallons of each cleanup material employed;
 - the VOC emissions from each cleanup material employed (C.3.b x C.3.c);
 - the total VOC emissions from all the cleanup materials employed (summation of C.3.d for all cleanup materials) in pounds or tons; and
 - 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:
- the company identification of each coating and cleanup material employed;
 - the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - the number of gallons of each coating and cleanup material employed;
 - 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;
 - 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;
 - 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;
 - for the first 12 months of operation following the issuance of the PTI, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - after the first 12 months of operation following the issuance of the PTI, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
5. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: butyl cellosolve
 TLV (ug/m3): 121
 Maximum Hourly Emission Rate (lbs/hr): 16.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 178
 MAGLC (ug/m3): 2880
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:
- changes in the composition of the materials used (mold release agent), 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;
 - changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - 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.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

8. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 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

- 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.
- The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - All exceedances of the rolling, 12-month VOC emission limitation of 25.4 tons (from the coating operations for emissions units K006 and K007 combined).
 - All exceedances of the monthly VOC emission limitation of 150 pounds (from the cleanup operations for emissions units K004, K005, K006, and K007 combined).
 - All exceedances of the rolling, 12-month coatings usage restriction of 62,000 gallons (for emissions units K006 and K007 combined).
 - All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.9 tons, respectively (for emissions units K004, K005, K006, and K007 combined).
 - for the first 12 calendar months of operation following the issuance of the PTI, 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).
 - All exceedances of the coating content restriction of 0.82 lbs VOC/gallon, as applied.

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

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

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

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.

Emission Limitation:
25.4 tons of VOC per rolling, 12-month period, from coating operations (from the coating operations for emissions units K006 and K007 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.

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 24.9 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.

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 of this permit.
- Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating or cleaning materials.

F. Miscellaneous Requirements

1. None