



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
CHAMPAIGN COUNTY  
Application No: 05-10787**

**CERTIFIED MAIL**

**DATE:** 3/29/00

Johnson Welded Products  
Renee Thrasher  
625 South Edgewood  
Urbana, OH

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA  
IN

SWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 05-10787**

Application Number: 05-10787  
APS Premise Number: 0511010131  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Johnson Welded Products  
Person to Contact: Renee Thrasher  
Address: 625 South Edgewood  
Urbana, OH 43078

Location of proposed air contaminant source(s) [emissions unit(s)]:

**625 South Edgewood  
Urbana, Ohio**

Description of proposed emissions unit(s):

**miscellaneous metal parts coating operation.**

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

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Director

**Johnson Welded Products**

**Facility ID: 0511010131**

**PTI Application: 05-10787**

**Issued: To be entered upon final issuance**

**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 Related to Monitoring and Recordkeeping 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

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**Issued: To be entered upon final issuance**

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

**Johnson Welded Products**

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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 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**Johnson Welded Products****Facility ID: 0511010131****PTI Application: 05-10787****Issued: To be entered upon final issuance****14. Construction Compliance Certification**

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

**15. Fees**

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	44.85
PE	0.46

John

PTI

Emissions Unit ID: **K001****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - miscellaneous metal parts coating line	OAC rule 3745-31-05(A)(3)	299.0 lbs. VOC/ day 44.85 TPY VOC  2.26 pounds VOC per gallon of coating, excluding water and exempt solvents.  0.16 pounds PE/hour 0.46 TPY PE
	OAC rule 3745-31-05(D)	0% opacity, as a six minute average, from the stack.  See term A.2.b. and C.2.

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, disposable paint filters with a design control efficiency of 98% on the booth exhaust and coating and cleanup material usage limits.
- 2.b** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

**John****PTI****Issued: To be entered upon final issuance**Emissions Unit ID: **K001**

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit.

- 2.c** The VOC content of any cleanup materials shall not exceed 6.71 lbs./gallon.

**B. Operational Restrictions**

1. The maximum coating usage for this emissions unit shall not exceed 113 gallons per day and 33,858 gallons per year.
2. The maximum cleanup material usage for this emissions unit shall not exceed 6.5 gallons per day and 1980 gallons per year.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating and cleanup material, as applied;
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. The VOC content of each coating (including water and exempt solvents), as applied, in pounds per gallon;
  - d. The VOC content of each cleanup material, in pounds per gallon;
  - e. The number of gallons (including water and exempt solvents), of each coating employed;
  - f. The number of gallons of each cleanup material employed; and
  - g. The total VOC emissions from all coatings and cleanup materials, in pounds or tons per month  $[(c \times e) + (d \times f)]$ .
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in

pounds of individual HAP per gallon of coating, as applied;

- c. The total combined HAP content 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 usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
- k. the updated rolling, 12-month summation of usage for each individual HAP emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. the updated rolling, 12-month summation of usage for total combined HAP emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by calling your Ohio EPA SWDO contact. This information does not have to be kept on a individual emissions unit basis.

\*\* This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

## **D. Reporting Requirements**

**John  
PTI**

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

1. The permittee shall notify the Ohio EPA Southwest District Office in writing of any daily record showing the use of noncomplying coatings or cleanup materials or exceedances of the coating and/or cleanup material usage limits. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Ohio EPA Southwest District Office of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
3. The permittee shall submit annual reports which identify any exceedance of the annual coating and/or cleanup material usage limitation, as well as corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation in term A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

2.26 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in term C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Emission Limitation:

298.95 lbs VOC/day, 44.85 tons VOC/year.

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

$$\text{lbs VOC/day} = (A \times B) + (C \times D)$$

$$\text{tons VOC/year} = (E \times B \times 0.0005) + (F \times D \times 0.0005)$$

where:

A = daily coating usage, gallons

B = VOC content of coatings, pounds per gallon

C = daily cleanup material usage, gallons

D = VOC content of cleanup material, pounds per gallon

E = annual coating usage, gallons

F = annual cleanup material usage, gallons

3. Emission Limitation:

0.124 lbs PE/hour, 0.46 tons PE/year.

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

$$\text{lbs PE/hour} = (\text{gallons sprayed per hour}) \times (\text{solids content}) \times (1 - \text{Transfer Efficiency}) \times (1 - \text{Control Efficiency})$$

$$\text{tons PE/year} = [(\text{gallons sprayed per year}) \times (\text{solids content}) \times (1 - \text{Transfer Efficiency}) \times (1 - \text{Control Efficiency})] / 2000$$

4. Compliance with the usage limits in term B.1 and B.2 shall be demonstrated by the recordkeeping in term C.1.
5. Compliance with the HAP emission limitation in term A.2.b shall be demonstrated by the

**John  
PTI**

Emissions Unit ID: **K001**

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recordkeeping in term C.2.

6. Emission Limitation for Air Toxics:

The permit to install for this emissions unit (K001) was evaluated based on the actual 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. 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: ethylene glycol butyl ether

TLV (mg/m<sup>3</sup>): 25

Maximum Hourly Emission Rate (lbs/hr): 13.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1204

MAGLC (ug/m<sup>3</sup>): 6579

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 still 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

**John****PTI /****Issued: To be entered upon final issuance**Emissions Unit ID: **K001**

- 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.

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.

**Johnson Welded Products**  
**PTI Application 05-10787**  
**Issue**

**Facility ID: 0511010131**

**Emissions Unit ID: K001**

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A.2.b, C.2, D.2 and E.4.

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-10787 Facility ID: 0511010131

FACILITY NAME Johnson Welded Products

FACILITY DESCRIPTION two miscellaneous metal parts coating operations CITY/TWP Urbana

SIC CODE 3465 SCC CODE EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION miscellaneous metal parts coating line

DATE INSTALLED 1984 and current

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	pounds per hour	0.124	0.46	0.124	0.46
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	pounds per day	298.95	44.85	298.95	44.85
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination:** use of compliance coatings, disposable paint filters with a design control efficiency of 98% on the booth exhaust and coating and cleanup material usage limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: ethylene glycol butyl ether

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-10787 Facility ID: 0511010131

FACILITY NAME Johnson Welded Products

FACILITY DESCRIPTION	two miscellaneous metal parts coating operations	CITY/TWP	Urbana
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**Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

NONE

**Please provide any additional permit specific notes as you deem necessary:**

NONE

**Permit To Install Synthetic Minor Write-Up**

NONE

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	44.85
PE	0.46