



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CLINTON COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 05-14421

Fac ID: 0514000190

DATE: 11/1/2007

R and L Transfer, Inc. - Trailer Repair
Jerry Johns
PO Box 271 600 Gillam Road
Wilmington, OH 45177-0271

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

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

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

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

Sincerely,

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

CC: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 11/1/2007
Effective Date: 11/1/2007**

FINAL PERMIT TO INSTALL 05-14421

Application Number: 05-14421
Facility ID: 0514000190
Permit Fee: **\$400**
Name of Facility: R and L Transfer, Inc. - Trailer Repair
Person to Contact: Jerry Johns
Address: PO Box 271 600 Gillam Road
Wilmington, OH 45177-0271

Location of proposed air contaminant source(s) [emissions unit(s)]:
**600 Gillam Road
Wilmington, Ohio**

Description of proposed emissions unit(s):
Semi trailer repair facility with paint booth and gas fired (2.43 mmBtu/hr) curing oven.

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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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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

Emissions Unit ID: K001

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.97
NOx	1.04
CO	0.88
PE	0.09
SO2	0.01
Combined HAPs	4.97

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K001) - Semi-Trailer paint booth with high volume low pressure (HVLP) spray guns, natural gas oven, and paper filters.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from the coatings employed in this emissions unit shall not exceed 90.0 lbs/day.</p> <p>The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 8.18 lbs/gallon, as applied.</p> <p>The emissions from natural gas combustion in the drying ovens shall not exceed the following:</p> <p>0.24 lb/hr and 1.04 tons/yr of NO_x; 0.20 lb/hr and 0.88 tons/yr of CO; 0.02 lb/hr and 0.08 ton/yr of PE; 0.001 lb/hr and 0.006 ton/yr of SO₂; and 0.013 lb/hr and 0.06 ton/yr of VOC.</p> <p>This emissions unit shall be equipment with a dry filter system that minimizes the release of particulate emissions from the coating operations.</p> <p>See term A.2.a below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii), OAC rules 3745-17-07(A) and 3745-17-10(B) for the drying ovens and OAC rule 3745-31-05(C).</p>

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OAC rule 3745-31-05(C) Synthetic minor to avoid MACT and Title V operating requirements.	Total combined VOC from the coating and cleanup operations shall not exceed 4.97 tons per rolling, 12-month period. The hazardous air pollutants (HAP(s)) emissions from this emissions unit shall not exceed 4.97 tons per rolling, 12-month period. See terms A.2.b and B.1 below.
OAC rule 3745-21-09(U)(2)(e)(iii)	The coatings usage in this emissions unit shall not exceed ten gallons per day.
OAC rule 3745-17-07(A) (for the drying ovens)	The visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-10(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The emission limitations for PE, SO₂, NO_x, CO and VOC from combustion of natural gas in the drying oven is established to reflect potential to emit for this emissions unit. Therefore, record keeping and reporting requirements are not necessary to ensure compliance with these limitations.
- 2.b** This permit establishes federally enforceable limitations on emissions of HAP(s) for purposes of avoiding 40 CFR Part 63, Subpart M and Title V operating permit requirements. Based on information provided in the permit to install application, the facility Potential to Emit (PTE) for HAP is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAPs based on the facility operations and the maximum HAP content of the coatings and cleanup material used. If any changes in the operations and/or coating and cleanup material formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V operating permit requirements.

Annual HAP emissions from this emissions unit shall not exceed 4.97 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly HAP emissions.

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Emissions Unit ID: K001

B. Operational Restrictions

1. The coating usage in this emissions unit shall not exceed 1000 gallons per rolling 12-month period. This is an existing emissions unit and therefore the permittee has existing coating usage records and does not need to be limited on a monthly basis for the first year.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed; and
 - d. the daily VOC emissions from the coatings employed, in pounds.

2. The permittee shall collect and record the following for each month for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon, as applied;
 - d. the VOC emissions from the coatings employed, in pounds, (the summation of all coatings ("b" x "c"));
 - e. the name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the total VOC emissions from all coatings and cleanup materials employed (the summation of all coatings in term C.2.d and cleanup materials ("f" x "g", in pounds or tons; and
 - i. the rolling, 12-month total combined VOC* emissions, in tons, (the total VOC emitted, in tons, for the current month plus the total amount of VOC emitted, in tons, for the 11 previous calendar months).

*for the purposes of establishing documentation of the amount of HAP emissions emitted from this emissions unit, it is assumed that all HAP are VOC and therefore record keeping of the amount of HAP emissions emitted is not required.

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3. The permit to install for this emissions unit 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ppm): 20 (Per R & L)

Maximum Hourly Emission Rate (g/s): 5.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 738.8

MAGLC (ug/m3): 1794.3

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (g/s): 4.88

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 635.2

MAGLC (ug/m3): 10,337.9

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(PPP)(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 (PPP)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

D. Reporting Requirements

1. The permittee shall notify the Director of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the daily VOC emissions from the coatings employed exceed 90 pounds;
 - b. the coating usage exceed 1000 gallons per rolling 12-month period;

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- c. the VOC emissions, from the use of coatings and cleanup, exceed 4.97 tons per rolling 12-month period; and
- d. the HAP(s) emissions, from this emissions unit**, exceed 4.97 tons per rolling 12-month period.

**at this time, the emission limitation represents all the HAP emissions from this emissions unit.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.2.

E. Testing Requirements

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

90.0 pounds of VOC per day, from coatings employed.

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation shall be determined through the record keeping requirements established in Section C.2, of this permit.
 - b. Emission Limitation:

4.97 tons of VOC per 12-month rolling period, from coatings and cleanup employed.

Applicable Compliance Method:

Compliance with the 12-month rolling period allowable VOC emission limitation shall be determined through the record keeping requirements established in Section C.2, of this permit.
 - c. Emission Limitation:

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20% Opacity, as a six minute average, from the stack.

Applicable Compliance Method:

If required, 40 CFR Part 60, Method 9, with opacity readings taken from the stack.

2. The emissions from natural gas combustion in the drying ovens shall not exceed the following:

0.24 lb/hr and 1.04 tons/yr NO_x;
0.20 lb/hr and 0.88 tons/yr CO;
0.02 lb/hr and 0.08 ton/yr PM;
0.001 lb/hr and 0.006 ton/yr SO₂; and
0.013 lb/hr and 0.06 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limitations for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/10⁶ scf) multiplied by the maximum combined hourly gas burning capacity of the burners (2.43 mmBtu) and times 1 scf/1020 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

If required, the permittee shall conduct appropriate emission testing pursuant to methods listed in 40 CFR Part 60.

F. Miscellaneous Requirements

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

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Emissions Unit ID: **K001**

SIC CODE 7538 SCC CODE 4-02-016 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Semi-Trailer paint booth with HVLP spray guns, natural gas oven, and paper filters.

DATE INSTALLED 12/1995

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	attainment	0.02 lb/hr	0.08	0.02 lb/hr	0.08
PM ₁₀					
Sulfur Dioxide	attainment	0.001 lb/hr	0.006	0.001 lb/hr	0.006
Organic Compounds	attainment	90.0 lb/day	5.02	90.0 lb/day	5.02
Nitrogen Oxides	attainment	0.24 lb/hr	1.04	0.24 lb/hr	1.04
Carbon Monoxide	attainment	0.20 lb/hr	0.88	0.20 lb/hr	0.88
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 The coating usage in this emissions unit shall not exceed 10 gallons/day nor 1000 gallons/year, the VOC content of coatings employed in this emissions unit shall not 9.00 lbs/gallon, as applied, the liquid organic cleanup materials employed in this emissions unit shall not exceed 8.33 gallons per month, the VOC content of liquid organic cleanup materials employed in this emissions unit shall not 8.18 lbs/gallon, as applied, and the volatile organic compound (VOC) emissions from the coatings employed in this emissions unit shall not exceed 90.0 lbs/day.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

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*? Y YES NO

IDENTIFY THE AIR CONTAMINANTS: Toluene, Xylene