State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
ASHLAND COUNTY
Application No: 03-16199
Fac ID: 0303000098

DATE: 12/14/2006

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

MCI Service Parts, Inc.
Carl Roth
520 North Spring Street
Loudonville, OH 44842

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

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

CC: **USEPA** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/14/2006**
Terms and Conditions	**Effective Date: 12/14/2006**

FINAL PERMIT TO INSTALL 03-16199

Application Number: 03-16199

Facility ID: 0303000098

Permit Fee: **$1000**

Name of Facility: MCI Service Parts, Inc.

Person to Contact: Carl Roth

Address: 520 North Spring Street
Loudonville, OH 44842

Location of proposed air contaminant source(s) [emissions unit(s)]:
520 North Spring Street
Loudonville, **Ohio**

Description of proposed emissions unit(s):
Requested FESOP update for detailed parts paint booth.

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

Joseph P. Koncelik

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 the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOCs	95
Individual HAP	9.5
Combined HAPs	24.0

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) - Miscellaneous Parts Conveyor Paint Line with water curtain (modification of existing unit to establish synthetic minor VOC & HAP limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a) 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)

2. Additional Terms and Conditions

2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001,and R005 combined (See B.1).

ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

2.b This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

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$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month	$\sum_{1}^{M} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000$ is less than or equal to
1	8.00
1-2	16.00
1-3	22.00
1-4	30.00
1-5	38.00
1-6	46.00
1-7	54.00
1-8	62.00
1-9	70.00
1-10	78.00

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1-11	86.00
1-12	95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

   a. the company name or identification for each coating/cleanup material employed;

   b. the volume, in gallons, of each coating/cleanup material employed;

   c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;

   d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

2. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

   c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

   d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

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e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:

a. the company identification of each coating/cleanup material employed;

b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating/cleanup material employed;

d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;

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

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

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b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

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

E. Testing Requirements

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

   a. <u>Emission Limitation:</u> 95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

      <u>Applicable Compliance Method:</u> Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

   b. <u>Emission Limitation</u>
      9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

      <u>Applicable Compliance Method</u>
      Compliance shall be based upon the record keeping requirements as specified in C.3.

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

None

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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 - (K002) - Primer Spray and Dip Spray Station (modification of PTI #03-0783 issued on 12/21/98 to establish synthetic minor VOC & HAP limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	41.0 pounds Volatile Organic Compounds (VOC)/day and 7.5 tons VOC/yr See section A.2.a.
OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b) 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum coating usage never exceeding 10 gallons in any one day

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U)(2)(e)(iii).

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001,and R005 combined (See B.1).

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ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}] \leq 95.00$$

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where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month	$\sum_{1}^{M} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000$ is less than or equal to
1	8.00
1-2	16.00
1-3	22.00
1-4	30.00
1-5	38.00
1-6	46.00
1-7	54.00
1-8	62.00
1-9	70.00
1-10	78.00
1-11	86.00
1-12	95.00

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After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for emissions unit K002:

   a. the name and identification number of each coating employed;

   b. the VOC content of each coating, in pounds per gallon, as applied;

   c. the number of gallons, of each coating employed;

   d. the total volume, in gallons, of all coatings employed;

   e. the total VOC emissions from all coatings employed, in pounds per day, (summation of C.1.b x C.1.c for all coatings employed);

   f. the annual year to date VOC emissions from all coatings employed, in tons per year, (summation of C.1.d for each calendar month to date from January to December);

2. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

   a. the company name or identification for each coating/cleanup material employed;

   b. the volume, in gallons, of each coating/cleanup material employed;

   c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;

   d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

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b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:

a. the company identification of each coating/cleanup material employed;

b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating/cleanup material employed;

d. the emission rate for each individual HAP from each coating/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/cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.4.e for all HAPs for all coatings/cleanup materials), in lbs;

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

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h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

   b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

   c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

   d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

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

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

3. The permittee shall submit annual reports that summarize the total annual actual VOC emissions from coating operations for this emissions unit. 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 in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

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a. Emission Limitation
41.0 lbs VOC/day, 7.5 tons VOC/yr

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C 1.

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

Applicable Compliance Method
Compliance shall be based on the record keeping requirements as specified in C.1.

c. Emission Limitation: 95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

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.

d. Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.4.

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

None

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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 - (K003) - Full Size Paint Booth (modification of PTI #03-16006 issued on 11/6/2003 to establish synthetic minor VOC & HAP limitations).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	16.2 pounds Organic Compounds (OC)/hr and 7.3 tons OC/yr See Section A.2.a
OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b) 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
OAC rule 3745-21-09(U)(2)(c)	VOC emission exemption based on the repainting (refinishing) of used motor vehicles

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U)(2)(c).

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001,and R005 combined (See B.1).

ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-

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month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

2.c The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

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$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month	$\sum_{1}^{M} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000$ is less than or equal to
1	8.00
1-2	16.00
1-3	22.00
1-4	30.00
1-5	38.00
1-6	46.00
1-7	54.00
1-8	62.00
1-9	70.00

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1-10	78.00
1-11	86.00
1-12	95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K003:

   a. the name and identification number of each coating employed;

   b. the OC content of each coating, in pounds per gallon, as applied;

   c. the number of gallons, of each coating employed;

   d. the total OC emissions from all coatings employed, in pounds per month, (summation of C.1.b x C.1.c for all coatings employed);

   e. the annual year to date OC emissions from all coatings employed, in tons per year, (summation of C.1.d for each calendar month to date from January to December);

2. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

   a. the company name or identification for each coating/cleanup material employed;

   b. the volume, in gallons, of each coating/cleanup material employed;

   c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;

   d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

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a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:

a. the company identification of each coating/cleanup material employed;

b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating/cleanup material employed;

d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;

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

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

   b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

   c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

   d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

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

2. The permittee shall submit annual reports that summarize the total annual actual OC emissions from coating operations for this emissions unit. 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 in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. <u>Emission Limitation</u>
   16.2 lbs OC/hr and 7.3 tons OC/yr

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Applicable Compliance Method
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2.0 gallons per hour) by the maximum OC content of all the coatings (8.1 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

Compliance with the annual allowable OC emission limitation shall be based on the record keeping requirements as specified in C 1.

b. Emission Limitation: 95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

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.

c. Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.4.

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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 - (R001) - Detail Parts Paint Booth with Waterwash (L2-DPB)(modification of existing unit to establish synthetic minor VOC & HAP limitations).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a) 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)

2. Additional Terms and Conditions

2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001,and R005 combined (See B.1).

ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

2.b This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

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$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month	$\sum_{1}^{M} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000$ is less than or equal to
1	8.00
1-2	16.00
1-3	22.00
1-4	30.00
1-5	38.00
1-6	46.00
1-7	54.00
1-8	62.00
1-9	70.00
1-10	78.00

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1-11	86.00
1-12	95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

   a. the company name or identification for each coating/cleanup material employed;

   b. the volume, in gallons, of each coating/cleanup material employed;

   c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;

   d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

2. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

   c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

   d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

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e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:

a. the company identification of each coating/cleanup material employed;

b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating/cleanup material employed;

d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;

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

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

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b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

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

E. Testing Requirements

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

   a. Emission Limitation: 95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

      Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

   b. Emission Limitation
      9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

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

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

None

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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 - (R005) - Miscellaneous Detailed Parts Paint Spray Booth (modification of existing unit to establish synthetic minor VOC & HAP limitations).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a) 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.a)

2. Additional Terms and Conditions

2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001,and R005 combined (See B.1).

ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

2.b This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

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$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P*o* = total gallons of recovered solvents

VOC*o* =VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month	$\sum_{1}^{M} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000$ is less than or equal to
1	8.00
1-2	16.00
1-3	22.00
1-4	30.00
1-5	38.00
1-6	46.00
1-7	54.00
1-8	62.00
1-9	70.00
1-10	78.00

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1-11	86.00
1-12	95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

   a. the company name or identification for each coating/cleanup material employed;

   b. the volume, in gallons, of each coating/cleanup material employed;

   c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;

   d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

2. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

   a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

   b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

   c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

   d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

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e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:

a. the company identification of each coating/cleanup material employed;

b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating/cleanup material employed;

d. the emission rate for each individual HAP from each coating/cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.3.e for all HAPs for all coatings/cleanup materials), in lbs;

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

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

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b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

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

E. Testing Requirements

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

   a. Emission Limitation: 95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

      Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

   b. Emission Limitation
      9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

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

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

None

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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 - (L002) - 50 gallon Isopropyl Alcohol Cold Cleaner Station (modification of PTI 03-0783 issued on 12/21/1998 to establish synthetic minor VOC & HAP limitations)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	50.4 pounds Volatile Organic Compounds (VOC)/day and 9.2 tons VOC/yr See section A.2.a
OAC rule 3745-31-05(C)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b) 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined (see section A.2.b)
OAC rule 3745-21-09(O)(2)	See A.2.d

2. Additional Terms and Conditions

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

2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001,and R005 combined (See B.1).

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ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.79	2.00
1-2	1.58	4.00
1-3	2.37	6.00
1-4	3.16	8.00
1-5	3.95	10.00
1-6	4.74	12.00
1-7	5.53	14.00
1-8	6.32	16.00
1-9	7.11	18.00
1-10	7.90	20.00
1-11	8.69	22.00
1-12	9.50	24.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

2.c This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a

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"Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

2.d In accordance with OAC rule 3745-21-09(O)(2), each owner or operator of a cold cleaner shall:

i. equip the cold cleaner with either:

a. a cover- if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at 100 degrees Fahrenheit or the solvent is heated or agitated, the cover shall be signed and constructed so that it can be easily operated with one hand; or

b. a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided a sink-like work area has an open drain area of less than 16 square inches and provided the solvent is neither heated above 120 degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit;

ii. equip the cold cleaner with a device for draining the cleaned parts-if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system;

iii. install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at 100 degrees Fahrenheit, or if the solvent is heated above 120 degrees Fahrenheit;

a. freeboard that gives a freeboard ratio greater than or equal to 0.7;

b. water cover (solvent must be insoluble in and heavier than water); or

c. other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Director; and

iv. operate and maintain the cold cleaner in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

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B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} - [(Po)(VOCo) \div 2000 \text{ lbs/Ton}] \leq 95.00$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

Po = total gallons of recovered solvents

VOCo =VOC content of recovered solvents in pounds of VOC per gallon

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coating/cleanup material employed in emissions units K001, K002, K003, L002, R001 and R005 combined, shall not exceed the following rates:

Month	$\sum_{1}^{M} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000$ is less than or equal to
1	8.00
1-2	16.00
1-3	22.00
1-4	30.00
1-5	38.00
1-6	46.00

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1-7	54.00
1-8	62.00
1-9	70.00
1-10	78.00
1-11	86.00
1-12	95.00

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coating/cleanup material shall be based upon a rolling, 12-month summation.

2. Emissions unit L002 shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

   a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;

   b. store waste solvent in covered containers;

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

   d. drain the cleaned parts until dripping ceases;

   e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge; and,

   f. clean only materials that are neither porous nor absorbent.

3. Emissions unit L002 shall be equipped with a device for draining the cleaned parts; and the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for emissions unit L002:

   a. the types of solvents employed in the cold cleaner;

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b. the vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit;

c. the number of gallons, excluding water and exempt solvents, of each cleaning solvent used;

d. the volatile organic compound emission rate for each solvent in pounds/day; and,

e. the annual year to date VOC emissions from all solvents material usage (the summation of C.1.d).

2. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:

a. the company name or identification for each coating/cleanup material employed;

b. the volume, in gallons, of each coating/cleanup material employed;

c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;

d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.

3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

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e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:

a. the company identification of each coating/cleanup material employed;

b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating/cleanup material employed;

d. the emission rate for each individual HAP from each coating/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/cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings/cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed (summation of C.4.e for all HAPs for all coatings/cleanup materials), in lbs;

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

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

5. The permit to install for emission unit L002 was evaluated based on the actual materials (coatings, cleanup materials and decreasing materials-specified by the permittee in PTI 03-0783 issued final on December 21, 1998) and the design parameters of the exhaust system for the emission units, 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 2.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 2.0 model was compared to the Maximum Acceptable

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Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

TLV (mg/m3): 983,000
Maximum Hourly Emission Rate (lbs/hr): 1.32
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5,371
MAGLC (ug/m3): 23,404

6. Physical changes to or changes in the method of operation of the emission unit(s) after 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

   c. physical changes to the emission unit(s) or 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.

   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:”

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 95.00 tons.

   b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating/cleanup material usage rates specified in section B.1.

   c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined).

   d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, K003, L002, R001, and R005 combined).

2. The permittee shall submit annual reports that summarize the total annual actual VOC emissions from all solvents material usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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

E. Testing Requirements

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

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a. Emission Limitation: 50.4 pounds of VOC per day and 9.2 tons of VOC per year

Applicable Compliance Method: Compliance with the annual allowable VOC emission above shall be based upon the recordkeeping requirements specified in section C.1 of this permit.

b. Emission Limitation: 95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

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.

c. Emission Limitation
9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.4.

2. Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

F. Miscellaneous Requirements

None

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