



State of Ohio Environmental Protection Agency

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**RE: DRAFT PERMIT TO INSTALL
ERIE COUNTY
Application No: 03-17058
Fac ID: 0322010276**

CERTIFIED MAIL

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

DATE: 2/14/2006

AERO-Classics, Inc.
Dan Plumb
1710 Sawmill Parkway
Huron, OH 44839

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

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

Sincerely,

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-17058

Application Number: 03-17058
Facility ID: 0322010276
Permit Fee: **To be entered upon final issuance**
Name of Facility: AERO-Classics, Inc.
Person to Contact: Dan Plumb
Address: 1710 Sawmill Parkway
Huron, OH 44839

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1710 Sawmill Parkway
Huron, Ohio**

Description of proposed emissions unit(s):
Vapor degreaser and 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

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 record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	9.63

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Aluminum Parts Coating (Primer - Zinc Chromate) - HVLP Spray	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(U)(2)(e)(iii)	coating operations: 41 lbs organic compounds (OC)/day, 7.48 tons OC/yr clean-up operations: 52 lbs OC/month, 0.31 tons /yr, See A.2.a VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. **Additional Terms and Conditions**

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emission 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;
 - d. The OC content of each coating employed, in lbs/gallon, as applied;
 - e. The OC emissions rate for each coating employed (b x d for each coating employed); and
 - f. The total OC emissions rate for all coatings, in lbs/day (summation of "e" for all coatings).
2. The permittee shall collect and record the following information each month for this emissions unit:
- a. The company identification of each cleanup material employed;
 - b. The number of gallons of each cleanup material employed;
 - c. The OC contents, in pounds per gallon, for each cleanup material employed;
 - d. The OC emission rate for each cleanup material employed, in lbs/month (b x c); and
 - e. The total OC emissions for all the cleanup materials employed, in pounds (summation of "d" for all cleanup materials).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 7.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2152

MAGLC (ug/m3): 4480

(assumes conservatively that 1 gallon of toluene as clean-up solvent is emitted all in one hour)

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 (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 emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. 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:"

- 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 deviation (excursion) reports for this emissions unit which identify any exceedance of the 41 lbs OC/day for coating and/or the 52 lb/month for cleanup.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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
41 lbs OC/day
7.48 tons OC/yr

Applicable Compliance Method

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

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.

- b. Emission Limitation
maximum daily coating usage not to exceed 10 gallons of coating in any one day

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements as specified in C.1.c.

- c. Emission Limitation:
52 lbs OC/month, 0.31 tons /yr, for cleanup operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.2.

AERO-Classics, Inc.

PTI Application: 03-17058

Issued: To be entered upon final issuance

Facility ID: 0322010276

Emissions Unit ID: K001

The annual allowable OC limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, if compliance is shown with the monthly limitation, compliance is shown with the annual limitation.

2. Formulation data or US EPA Method 24 shall be used to determine the OC/VOC content of the coatings.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L001 - Vapor Degreaser (Solvent Cleaning Machine) - Metal Parts - 48" x 30" - trichloroethylene (with still)	OAC rule 3745-31-05(A)(3)	see A.2.a.
	OAC rule 3745-31-05(C)	1.84 tons Organic Compounds (OC) /rolling 12-month period (see A.2.c.)
	40 CFR 63.464(a)(1) MACT Subpart T	30.6 lbs OC / sq ft per month, as a rolling 3-month average control requirements, operational practices, see terms and conditions below
	OAC rule 3745-21-09(O)	exempt, see A.2.b.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements established under OAC rule 3745-31-05(C) and 40 CFR 63, Subpart T.
- 2.b The exemption allowed in accordance with OAC rule 3745-21-09(O)(6)(b) is not currently part of the federally-approved state implementation plan (SIP). During the rule making process, Ohio EPA received confirmation from U.S. EPA concerning the acceptability of this exemption. Therefore, this exemption will be considered to be federally enforceable while SIP approval by U.S. EPA is being obtained.
- 2.c This permit establishes a federally enforceable emission limitation of 1.84 tons of OC per rolling 12-month period for purposes of limiting potential to emit. An emission limitation on OCs effectively restricts emissions of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs).

B. Operational Restrictions

1. The maximum annual solvent usage for this emissions unit shall not exceed 300 gallons per rolling, 12-month period. The permittee shall use existing records to determine compliance with the rolling 12-month restrictions upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

C. Monitoring and/or Record keeping Requirements

1. On the first operating day of every month the permittee shall ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

[40 CFR 63.465(b)]

2. The permittee shall maintain the following records monthly:
 - a. The dates and amounts of solvent that are added to the solvent cleaning machine;
 - b. The solvent composition of wastes removed from cleaning machines as determined using the procedure described in 40 CFR 63.465(c)(2); and
 - c. Calculation sheets showing how monthly emissions and the rolling 3-month average OC emissions from the solvent cleaning machine were determined, and the results of all calculations, in accordance with 40 CFR 63.465(c).

If the applicable 3-month rolling average emission limit is not met, an exceedance has occurred.

[40 CFR 63.467(c), 40 CFR 63.464(c)]

3. The permittee shall collect and record the following information each month regarding OC emissions from the solvent cleaning operations for this emissions unit:
 - a. The company identification for each solvent employed;
 - b. The OC content of each solvent employed, in pounds/gallon;
 - c. The number of gallons of each solvent employed;
 - d. The OC emissions for each solvent employed ("b" x "c"), in pounds/month;

- e. The number of gallons of all solvents employed (summation of "c");
- f. The total OC emissions for all solvents employed (summation of "d"), in pounds/month;
- g. The total annual number of gallons of all solvents employed, based upon a rolling, 12-month summation; and
- h. The total combined annual emissions of OC in tons, based upon a rolling, 12-month summation of the monthly OC emission rates.

NOTE: The permittee may calculate the annual OC emission rate in accordance with the following formula if waste solvent is sent off-site for reclamation/disposal:

emission rate = (the total gallons of solvent used x the solvent density) - (the total gallons of waste solvent shipped offsite x the average solvent content of the waste solvent).

D. Reporting Requirements

- 1. The permittee has submitted to the Ohio EPA (OEPA), Northwest District Office (NWDO) an initial statement of compliance for this emissions unit, included with the Permit to Install application. This report included the following information:
 - a. The name and address of the solvent cleaning machine owner or operator;
 - b. The address of the solvent cleaning machine;
 - c. The solvent/air interface area for the solvent cleaning machine; and
 - d. The results of the first 3-month average emission calculation.

[40 CFR 63.468(e)]
- 2. The permittee shall submit a solvent emission report every year. This solvent emission report shall contain the following information:
 - a. The size and type of this emissions unit (solvent/air interface area or cleaning capacity);
 - b. The average monthly solvent consumption in lbs per month; and
 - c. The 3-month monthly rolling average solvent emission estimates calculated each month using the method as referenced in section C.2.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[40 CFR 63.468(g)]

3. The permittee shall submit an exceedance report to the OEPA, NWDO semiannually, except when the OEPA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information specified below:
 - a. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - b. If no exceedances of a parameter have occurred, such information shall be stated in the report.

[40 CFR 63.468(h)]

4. If the permittee is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:
 - a. The source has demonstrated a full year of compliance without an exceedance;
 - b. The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified 40 CFR 63 Subpart A (General Provisions); and
 - c. The OEPA does not object to a reduced frequency of reporting for the affected source as provided in 40 CFR 63.10(e)(3)(iii) (in the General Provisions).

[40 CFR 63.468(i)]

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month solvent usage restrictions. These reports shall be postmarked by April 30, July 30, October 30 and January 30 and shall cover the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
1.84 tons OC/rolling 12-month period

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements specified in Section C.3.
 - b. Emission Limitation:
30.6 lbs OC / sq ft per month, as a rolling 3-month average

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. As an alternative to meeting the requirements of 40 CFR 63.463, the permittee has elected to comply with the requirements of 40 CFR 63.464, as specified in this permit. If the permittee elects to comply with the requirements of 40 CFR 63.463 or other equivalent methods of control using the procedures described in 40 CFR 63.469, the permittee would be required to notify Ohio EPA, in writing, prior to implementation.