

A. Applicable Emission Limitations and/or Control Requirements

1. The emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY as a rolling, twelve-month summation for any single HAP and 25 TPY as a rolling, twelve-month summation for any combination of HAPs.
2. For pounds per hour, pounds per day and annual emissions limitations for emissions units R001 and R002 see the Air Emissions Summary page of this permit.
3. The permittee shall not employ coatings in emissions units R001 and R002 with a OC content greater than 3.5 pounds per gallon of coating, excluding water and exempt solvents, as applied.
4. The permittee shall not employ cleanup materials in emissions units R001 and R002 with a OC content greater than 6.55 pounds of OC per gallon.
5. Visible particulate emissions from each of the emissions units R001 and R002 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

B. Operational Restrictions

1. When coating metal parts, the maximum daily coating usage for each of the emissions units R001 and R002 shall not exceed 52.8 gallons per day.
2. When coating nonmetal parts, the maximum daily coating usage for each of the emissions units R001 and R002 shall not exceed 11 gallons per day.
3. The maximum daily cleanup material usage for each of the emissions units R001 and R002 shall not exceed 2 gallons per day.
4. The maximum annual coating and cleanup material usage for each of the emissions units R001 and R002 shall not exceed the following:

International Trailer Corp.

PTI 14-4561

Page -2-

5,667 gallons of coating per year and 300 gallons of

cleanup material per year.

5. The use of photochemically reactive cleanup materials as defined in OAC rule 3745-21-01 (C)(5) is prohibited.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].

International Trailer Corp.
PTI 14-4561
Page -3-

-
-
-
-
-
-
-
-
-
-
- j. The total combined HAP emissions from all coatings

and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

- k. The updated rolling twelve-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, twelve-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

2. The permittee shall maintain the following daily records for all coatings employed when coating nonmetal parts in emissions units R001 and R002 (these records shall be maintained separately for each of these emissions units):
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The organic compound content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents (b x c).
 - d. The total organic compound emission rate for all coatings, in pounds per day.

International Trailer Corp.

PTI 14-4561

Page -4-

3. The permittee shall maintain the following monthly

records for all coatings employed when coating metal parts in emissions units R001 and R002 (these records shall be maintained separately for each emissions unit):

- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The organic compound content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents.
 - d. The total organic compound emission rate for all coatings employed, in pounds per day (b x c).
4. The permittee shall maintain the following daily records for all cleanup materials employed in emissions units R001 and R002 (these records shall be maintained separately for each of these emissions units):
- a. The company identification for each organic cleanup material employed.
 - b. Documentation on whether or not the organic cleanup material is a photochemically reactive material as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C) (5).
 - c. The number of gallons of each organic cleanup material employed.
 - d. The OC content of each organic cleanup material, in pounds per gallon, as applied.
 - e. The total OC emission rate for all organic cleanup materials employed, in pounds per day (c x d).
5. 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 limited to, all calibration and maintenance records and all original strip-chart

International Trailer Corp.

PTI 14-4561

Page -5-

recordings for continuous monitoring instrumentation

and copies of all reports required by this permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit R001:
 - a. An identification of each day during which a non-metal part was coated and the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the average organic compound emissions from the organic cleanup material exceeded 13.1 pounds per day, and the average OC emissions for each such day.
 - c. An identification of each day during which the daily coating usage limitation for coating non-metal parts exceeded 11 gallons per day and the actual number of gallons used on each such day.
 - d. An identification of each day during which the daily cleanup material usage limitation exceeded 2 gallons per day and the actual number of gallons used on each such day.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials in emissions unit R001. The notification shall include a copy of such record and shall be sent to the Director (Hamilton County Department of Environmental Services) within 30 days following the date of noncompliance.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which summarize the following for emissions unit R001:

- a. The total organic compound emissions from this emissions unit for the previous calendar year.
- b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
- c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material (as defined in OAC rule 3745-21-01(C)(5) was employed in emissions unit R001. This report shall identify the cause for the use of the photochemically reactive cleanup material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit R002:
 - a. An identification of each day during which a non-metal part was coated and the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the average organic compound emissions from the organic cleanup material exceeded 13.1 pounds per day, and the average organic compound emissions for each such day.
 - c. An identification of each day during which the daily coating usage limitation for coating non-metal parts exceeded 11 gallons per day and the actual number of gallons used on each such day.

International Trailer Corp.
PTI 14-4561

- d. An identification of each day during which the daily cleanup material usage limitation exceeded 2 gallons per day and the actual number of gallons used on each such day.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials in emissions unit R002. The notification shall include a copy of such record and shall be sent to the Director (Hamilton County Department of Environmental Services) within 30 days following the date of noncompliance.
 7. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which summarize the following information for emissions unit R002:
 - a. The total organic compound emissions from this emissions unit for the previous calendar year.
 - b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

These reports shall be submitted by January 31 of each year.

8. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material (as defined in OAC rule 3745-21-01(C)(5) was employed in emissions unit R002. This report shall identify the cause for the use of the photochemically reactive cleanup material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

9. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
10. The permittee shall submit required reports in the following manner:
 - a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly i.e., by January 30, April 30, July 30, and October 30 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.)

E. Compliance Methods/Testing Requirements

1. Compliance with the visible emissions limitations in Section A.5 shall be determined by Method 9, 40 CFR 60 Appendix A.
2. Compliance with the particulate emission limitation shall be demonstrated by the following:
 - a. $\text{Lbs/Hr.} = \text{Weight of gallon of coating} \times \% \text{ by weight of solids} \times \text{gallons of coatings per hour} \times 1 - \text{TE}(\text{transfer eff.}) \times 1 - \text{CE}(\text{control eff.})$, where TE = 55% and CE = 90%.
 - b. $\text{TPY} = \text{Weight of gallon of coating} \times \% \text{ by weight of solids} \times \text{gallons of coatings per year} \times 1 - \text{TE}(\text{transfer eff.}) \times 1 - \text{CE}(\text{control eff.}) \times 1/2000$, , where TE = 55% and CE = 90%.
3. The permittee shall calculate the OC emission rate by multiplying the OC content of each coating and organic cleanup material employed (in pounds per gallon, as applied, excluding water and exempt solvents) by the coating and organic cleanup material usage rate (in gallons) and taking the sum for all coatings and organic cleanup material.
4. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the HAP limitation shall be determined by the recordkeeping requirements in section C.1 of this permit.

6. Compliance with annual VOC emission limit and the annual coating usage limit shall be determined by the recordkeeping requirements in section C.2. of this permit.

F. Miscellaneous Requirements

1. The hourly emission limitation outlined in this permit, for nonmetal parts coating, is based upon the emission units PTE. Therefore, no hourly records are required to demonstrate compliance with these limits, when coating nonmetal parts.
2. The daily emission limitation outlined in this permit, for metal parts coating, is based upon the emission units PTE. Therefore, no hourly or daily records are required to demonstrate compliance with these limits, when coating metal parts.
3. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4561. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: Isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 3.6 each

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 3022.97 (R001 and R002 combined)

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3619

Pollutant: Xylene

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 4.9 each

Predicted 1 Hour Maximum Ground-Level Concentration at
the Fenceline (ug/m3): 4113 (R001 and R002 combined)

Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m3): 10,333

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4561 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.
- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

- e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01 (V).

PTI 14-4561

International Trailer, Corp.
2896 State Route 232
Bethel, Ohio 45106

Premise Number: 1413030394

International Trailer Corp is a manufacturer of commercial flatbed trailers. The facility has requested a Permit to Install for two existing paint spray booths, R001 and R002, used to paint the metal and nonmetal parts of the trailers.

The applicable regulations are 3745-31-05, 3745-15-07, 3745-17-07, 3745-17-11, 3745-21-07(G) and 3745-21-09(U) (1).

BAT is satisfied by emissions limitations, usage limitations, VOC content limitations and compliance with the Air Toxics Policy. The allowable emissions for each emissions unit are as follows: 184.8 lbs. OC/day from coatings for metal parts, 8 lbs. OC/hr. and 40 lbs. OC/day from coatings for nonmetal parts, 13.1 lbs. OC/day from organic cleanup materials, 11 TPY of OC overall, 0.54 lbs. PM-PM10/hr., and 2.4 TPY PM-PM10. The OC content of the coatings is limited to 3.5 lbs. OC/gallon and cleanup materials are limited to 6.55 lbs. OC/gallon. Usage limitations will ensure compliance with the annual emission limitations.

A preliminary permit to install should be issued since the emissions unit will be in compliance with the applicable regulations.

The permit fee is: R001 + R002 @ \$200.00 each = \$400.00

The fee was not doubled for R001 and R002 since the emissions units were installed prior to July 1, 1993.

Prepared by: Thomas P. Wittekind
Date prepared: May 20, 1998

Synthetic Minor Determination

International Trailer, Corp.
PTI 14-4561

A. Emissions Units Description

The Permit to Install (PTI 14-4561) covers two paint spray operations. The permittee has applied for a federally enforceable PTI.

B. Facility Emissions and Attainment Status

International Trailer, Corp. is a major stationary source based on potential Hazardous Air Pollutants (HAPs) emissions. The permittee wishes to incorporate federally enforceable limitations in the PTI limiting HAP emissions to less than 10 TPY for any single HAP and less than 25 TPY for combined HAPs.

C. Source Emissions

Potential emissions were calculated based on maximum capacity and 8760 hrs/yr of operation. The potential emissions from these emissions units in the absence of this federally enforceable PTI is calculated at 30 TPY for a combination of HAP's. The emissions limitations outlined in this PTI limit HAP emissions to less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs. The permittee will record coating usages and submit reports as described in the PTI's terms and conditions to ensure compliance with the emissions limitations.

D. Conclusion

The terms and conditions in this PTI limit the permittee's potential HAP emissions to less than 10 TPY for any single HAP and less than 25 TPY of combined HAPs. The permittee will maintain coating usage records and submit reports as outlined in the terms and conditions for all emissions units to demonstrate compliance with the emissions limitations. Because the potential HAP emissions are less than 10 TPY for any single HAP and less than 25 TPY of combined HAPs, the permittee will not be subject to the requirements of Title V permitting.

Prepared by: Thomas P. Wittekind
Date prepared: May 20, 1998

Toxic Screening Analysis

International Trailer, Corp.
PTI 14-4561

R001 and R002

R001 and R002 have horizontal stacks associated with them and they were modeled as point sources with isobutanol and xylene as the pollutants being modeled. The emissions were assumed to be coming from each of the two identical stacks (from two separate emissions units) with 3.6 lbs of isobutanol/hr and 4.9 lbs of xylene/hr as the emissions rate from each emissions unit. The SCREEN results are summarized below.

The following pollutants were evaluated:

Xylene: Emitted from the coatings.
Isobutanol: Emitted from the cleanup material.
Xylene: 4.9 lbs/hr from R001 & R002 each.

TLV = 434 mg/m³
MAGLC based on TLV/42 = 10333.33 µg/m³

Maximum ground level concentration @ fence line from screen =
R001 + R002 = 4113 µg/m³

The maximum ground level is less than TLV/42 and thus,
further modeling is not required.

Isobutanol: 3.6 lbs/hr from R001 and R002 each.

TLV = 152 mg/m³
MAGLC based on TLV/42 = 3619.048 µg/m³
MAGLC based on TLV/70 = 2171.428 µg/m³

Maximum ground level concentration @ fence line from screen =
R001 + R002 = 3022.97 µg/m³

The maximum ground level is less than TLV/70 and thus,
further modeling is not required.

The emissions units pass a toxic screening analysis and no
further modeling is required.