



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/3/2011

Alan McAdams
TRUTEC INDUSTRIES, INC.
4795 UPPER VALLEY PK.
URBANA, OH 43078

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0511010106
Permit Number: P0107648
Permit Type: Renewal
County: Champaign

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
TRUTEC INDUSTRIES, INC.**

Facility ID:	0511010106
Permit Number:	P0107648
Permit Type:	Renewal
Issued:	3/3/2011
Effective:	3/3/2011
Expiration:	3/3/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
TRUTEC INDUSTRIES, INC.

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Authorization

Facility ID: 0511010106
Application Number(s): A0041237
Permit Number: P0107648
Permit Description: FEPTIO renewal for the following emissions units: K001, main e-coat line, electrodeposition coating tank and drying oven, K002, solid lube spray coating booth with bake ovens, K005, coating repair spray booth, K006, small parts e-coat line, electrodeposition and drying oven, K007, gecom tumbler, tumble coating, K008, Cylinder paint machine, and P004, hydrophilic mixing tank, 300 gallon stainless steel tank for batch mixing.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/3/2011
Effective Date: 3/3/2011
Expiration Date: 3/3/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TRUTEC INDUSTRIES, INC.
4795 UPPER VALLEY PK.
URBANA, OH 43078

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

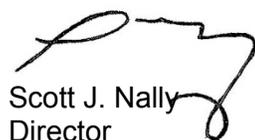
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107648
Permit Description: FEPTIO renewal for the following emissions units: K001, main e-coat line, electrodeposition coating tank and drying oven, K002, solid lube spray coating booth with bake ovens, K005, coating repair spray booth, K006, small parts e-coat line, electrodeposition and drying oven, K007, gecom tumbler, tumble coating, K008, Cylinder paint machine, and P004, hydrophilic mixing tank, 300 gallon stainless steel tank for batch mixing.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	main e-coat line
Superseded Permit Number:	05-12594
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	solid lube spray coating booth
Superseded Permit Number:	05-12594
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	coating repair spray booth
Superseded Permit Number:	05-12594
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	small parts e-coat line
Superseded Permit Number:	05-12594
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	gecom tumbler
Superseded Permit Number:	05-12594
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	cylinder paint machine
Superseded Permit Number:	05-12867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	hydrophilic mixing tank, 300 gallon
Superseded Permit Number:	05-12594
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- **PTIO fee.** This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- **Annual emissions fee.** Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southwest District Office in accordance with OAC

rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K001, main e-coat line

Operations, Property and/or Equipment Description:

main e-coat line, electrodeposition coating tank and drying oven (Terms in this permit supersede those identified in PTI 05-12594, issued 7/31/2003).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)h, d)(6), d)(7) and d)(8).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) content of the resin material employed in this emissions unit shall not exceed 0.5 lbs/gal, as employed. The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 lbs/gal, as employed. Organic compound (OC) emissions from cleanup materials shall not exceed 6.52 TPY. Visible particulate emissions (PE) from the stack shall not exceed 5% opacity. Emissions from natural gas combustion in the drying oven shall not exceed: 0.22 lb/hr and 0.95 TPY for NOx 0.18 lb/hr and 0.79 TPY for CO

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.004 lb/hr and 0.018 TPY for PE 0.02 lb/hr and 0.053 TPY for VOC 0.001 lb/hr and 0.006 TPY for SO ₂ The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-18-06(A), 3745-21-08(B), 3745-21-09(U), 3745-23-06(B), and 3745-35-07(B). See section b)(2)a.
b.	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input (for the drying oven).
d.	OAC rule 3745-18-06(A)	See section b)(2)b.
e.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
f.	OAC rules 3745-21-08(B) and 3745-23-06(B)	See section b)(2)c.
g.	OAC rule 3745-35-07(B)	The VOC emissions from all resins and pastes employed in this emissions unit shall not exceed 20.57 tons per rolling 12-month period. See section b)(2)d.
h.	OAC rule 3745-114-01	Ohio Toxics Policy.

(2) Additional Terms and Conditions

- a. The emission limitations for PE, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed

that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

c) Operational Restrictions

- (1) The maximum annual resin material usage for this emissions unit shall not exceed 56,285 gallons, based upon a rolling, 12-month summation of the resin material usage figures.
- (2) The maximum annual paste material usage for this emissions unit shall not exceed 6,494 gallons, based upon a rolling, 12-month summation of the paste material usage figures.
- (3) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the VOC content of each resin material, in pounds per gallon, as employed;
 - b. the volume of each resin material employed, in gallons;
 - c. the rolling, 12-month summation of the resin material usage figures, in gallons;
 - d. the total VOC emissions from all the resin materials, in tons, i.e., summation of [(a x b)/2000] for each resin material employed;
 - e. the VOC content of each paste material, in pounds per gallon, as employed;
 - f. the volume of each paste material employed, in gallons;

- g. the rolling, 12-month summation of the paste material usage figures, in gallons;
 - h. the total VOC emissions from all the paste materials, in tons, i.e., summation of $[(e \times f)/2000]$ for each paste material employed;
 - i. the total VOC emission for the resin and the paste materials employed, in tons, i.e., $(d + h)$; and
 - j. the rolling, 12-month summation of the VOC emissions for this emissions unit.
- (3) The permittee shall collect and record the following information each month for this facility:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the individual HAP* content for each coating and cleanup material employed, in pounds per gallon;
 - c. the volume, in gallons, of each coating and cleanup material employed;
 - d. the total individual HAP emission rate, in tons, i.e, the summation of $(b \times c)$ for each coating and cleanup material employed divided by 2000 lbs/ton;
 - e. the total combined HAP emission rate, in tons, i.e., the summation of all individual HAP emissions as determined in (d).
 - f. the rolling, 12-month summation of each individual HAP emissions for this facility; and
 - g. the rolling, 12-month summation of the combined HAP emissions for this facility.
- (4) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons, i.e., summation of $[(b \times c)/2000]$ for each cleanup material employed.
- (5) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (6) The permit to install for this emissions unit K001 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: Methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 0.56

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 894

MAGLC (ug/m³): 4,881

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (8) 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation of 20.57 tons;
 - b. the rolling, 12-month resin material usage limitation of 56,285 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative resin material usage level;
 - c. the rolling, 12-month paste material usage limitation of 6,494 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paste material usage level;
 - d. the rolling, 12-month individual HAP emission limitation of less than 10.0 tons, and/or the combined HAP emission limitation of less than 25.0 tons, for this facility.
 - (3) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of a coating with a VOC content that exceeds the limitation for resin of 0.5 lbs/gal, as employed, the limitation for paste of 2.0 lbs/gal, as employed, and the as applied limitation of 3.0 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office, within 30 days following the end of the calendar month.
 - (4) The permittee shall submit annual reports to Ohio EPA, Southwest District Office, which specify the total OC emissions for cleanup materials from this emissions unit for the previous calendar year (limitation of 6.52 tons/year). These reports shall be submitted by January 31 of each year.
 - (5) The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

The VOC content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.

The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.

b. Emission Limitation:

OC emissions shall not exceed 27.09 tons per year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined through the record keeping requirements established in Section d)(4) of this permit.

c. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

d. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.22 lb/hr and 0.95 ton/year for nitrogen oxides (NO_x)

0.18 lb/hr and 0.79 ton/year for carbon monoxide (CO)

0.004 lb/hr and 0.018 ton/year for particulate emissions (PE)

0.02 lb/hr and 0.053 ton/year for VOC

0.001 lb/hr and 0.006 ton/year for sulfur dioxide (SO₂)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (2,157 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NO_x/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM₁₀/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO₂/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

e. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

f. VOC Content Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section d)(1) of this permit.

g. Emission Limitation:

VOC emissions shall not exceed 20.57 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.

h. Emission Limitation:

The emissions 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 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.



Applicable Compliance Method:

Compliance with the rolling, 12-month individual and combined HAP emission limitations for this facility shall be determined through the record keeping requirements established in Section d)(3) of this permit.

- i. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

- (1) None.



2. K002, solid lube spray coating booth

Operations, Property and/or Equipment Description:

solid lube spray coating booth with bake ovens (Terms in this permit supersede those identified in PTI 05-12594, issued 7/31/2003).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)i, d)(5), d)(6) and d)(7).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(A)(3) | VOC content of coatings, cleanup materials, particulate emissions, and visible PE.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>the bake ovens shall not exceed: 0.04 lb/hr and 0.175 TPY for NOx 0.03 lb/hr and 0.144 TPY for CO 0.001 lb/hr and 0.004 TPY for PE 0.002 lb/hr and 0.009 TPY for VOC 0.0002 lb/hr and 0.001 TPY for SO2</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-18-06(A), 3745-21-08(B), 3745-21-09(U), 3745-23-06(B), and 3745-35-07(B).</p>
b.	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input (for the bake ovens).
d.	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(A)	See section b)(2)b.
f.	OAC rule 3745-21-09(U)(2)(e)	Coating usage shall not exceed 10 gallons per day.
g.	OAC rules 3745-21-08(B) and 3745-23-06(B)	See section b)(2)c.
h.	OAC rule 3745-35-07(B)	VOC emissions shall not exceed 14.81 tons per rolling, 12-month summation. See section b)(2)d.
i.	OAC rule 3745-114-01	Ohio Toxics Policy.

(2) Additional Terms and Conditions

- a. The 0.2 lb PE per hour limitation from coating activities and the emission limitations for PE, SO2, NOx, CO and VOC from natural gas combustion in the bake ovens are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to

industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall employ fabric filters as a control system for PE whenever this emissions unit is in operation.
- (3) The maximum annual coating usage for this emissions unit shall not exceed 3,650 gallons, based upon a rolling, 12-month summation of the resin material usage figures.
- (4) The maximum annual cleanup material usage for this emissions unit shall not exceed 1,643 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the VOC content of each coating, as applied, in pounds per gallon;
 - b. the volume of each coating, as applied, in gallons;

- c. the rolling, 12-month summation of the coating usage figures, in gallons;
 - d. the VOC emissions for all coatings employed, in tons, i.e., summation of (a x b) for each coating employed divided by 2000 lbs/ton;
 - e. the name and identification of each cleanup material employed;
 - f. the volume, in gallons, of each cleanup material employed;
 - g. the rolling, 12-month summation of the cleanup material usage figures, in gallons;
 - h. the VOC content, in pounds per gallon, of each cleanup material employed;
 - i. the VOC emissions for all the cleanup materials employed, prior to any credit for recovered materials, in tons, i.e., summation of (f x h) for each cleanup material employed divided by 2000 lbs/ton;
 - j. the date the recovery tank was emptied;
 - k. the date the materials from the recovery tank were shipped off site;
 - l. the date the materials from the recovery tank were shipped off site;
 - m. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material (a composite sample of all drums is acceptable for purposes of this requirement);
 - n. the VOC from recovered materials, to be credited against the total VOC emissions from the cleanup materials employed, in tons, i.e., summation of (l x m) for each shipment divided by 2000 lbs/ton;
 - o. the net VOC emissions for all the cleanup materials employed, in tons, i.e., (i - n);
 - p. the total VOC emissions from both the coatings and the cleanup materials employed, in tons, i.e., (d + o); and
 - q. the rolling, 12-month summation of the total VOC emissions for this emissions unit.
- (3) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit is not in service while this emissions unit is operating.
- (5) The permit to install for this emissions unit K002 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: N, N – Dimethylacetamide

TLV (mg/m³): 36

Maximum Hourly Emission Rate (lbs/hr): 5.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 674

MAGLC (ug/m³): 848

- (6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- (7) 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation of 14.81 tons;
 - b. the rolling, 12-month coating usage limitation of 3,650 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage level; and
 - c. the rolling, 12-month cleanup material usage limitation of 1,643 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage level.
 - (3) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 10 gallons. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.
 - (4) The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (5) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filter control system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.
 - (6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

8.0 lbs VOC per gallon of coating, as applied

8.58 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section d)(2) of this permit.

b. Emission Limitation:

0.2 pound per hour and 0.88 tons per year PE for coating activities

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE from coating activities, the following equation may be used:

$$E = C_s \times (1 - TE) \times (1 - CE)$$

where:

E = PE rate, in pounds per hour

C_s = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The annual PE limitation was established by multiplying the maximum hourly PE limitation by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

c. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

d. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.04 lb/hr and 0.175 TPY for nitrogen oxides (NO_x)

0.03 lb/hr and 0.144 TPY for carbon monoxide (CO)

0.001 lb/hr and 0.004 TPY for PE

0.002 lb/hr and 0.009 TPY for VOC

0.0002 lb/hr and 0.001 TPY for sulfur dioxide (SO₂)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (393 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NO_x/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM₁₀/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO₂/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

e. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

f. Emission Limitation:

VOC emissions shall not exceed 14.81 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.



g. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.



3. K005, coating repair spray booth

Operations, Property and/or Equipment Description:

coating repair spray booth (Terms in this permit supersede those identified in PTI 05-12594, issued 7/31/2003).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f, d)(4), d)(5) and d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) with detailed emission and control measures.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 5% opacity. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
b.	OAC rule 3745-17-07(A)	The visible PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(2)	The hourly PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(U)(2)(e)	The coating usage limitation established pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule.3745-35-07(B)	VOC emissions shall not exceed 1.20 tons per rolling, 12-month summation. See section b)(2)b.
f.	OAC rule 3745-114-01	Ohio Toxics Policy.

(2) Additional Terms and Conditions

- a. The 0.02 lb PE per hour limitation are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 312 gallons, based upon a rolling, 12-month summation of the coating usage figures.

- (2) The maximum annual cleanup material usage for this emissions unit shall not exceed 73 gallons, based upon a rolling, 12-month summation of the coating usage figures.
 - (3) The permittee shall employ fabric filters as a control system for PE whenever this emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records of the following for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
 - (2) The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in pounds per gallon;
 - c. the volume of each cleanup material employed, in gallons;
 - d. the rolling, 12-month summation of the cleanup material usage figures, in gallons;
 - e. the VOC emissions for all the cleanup materials employed, in tons, i.e., summation of $[(b \times c)/2000]$ for each cleanup material employed;
 - f. the VOC content of each coating, as applied, in pounds per gallon;
 - g. the volume of each coating, as applied, in gallons;
 - h. the rolling, 12-month summation of the coating usage figures, in gallons;
 - i. the VOC emissions for all coatings employed, in tons, i.e., summation of $[(f \times g)/2000]$ for each coating employed;
 - j. the sum total VOC emissions for all coating and cleanup materials, in tons, i.e., $(e + i)$; and
 - k. the rolling, 12-month summation of the total VOC emissions for this emissions unit.
 - (3) The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit is not in service while this emissions unit is operating.
 - (4) The permit to install for this emissions unit K005 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: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,274

MAGLC (ug/m³): 14,048

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (6) 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation 1.2 tons;
 - b. the rolling, 12-month coating usage limitation of 312 gallons; and
 - c. the rolling, 12-month cleanup material usage limitation of 73 gallons.
 - (3) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 3.0 gallons. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.
 - (4) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filter control system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.
 - (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. VOC Content Limitation:
 - 6.1 lbs VOC/gallon of coating, as applied
 - 6.8 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section d)(2) of this permit.

b. Emission Limitation:

0.020 lb PE per hour and 0.09 tons PE per year from coating activities

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE, the following equation may be used:

$$E = Cs \times (1 - TE) \times (1 - CE)$$

where:

E = PE rate, in pounds per hour

Cs = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The annual PE limitation was established by multiplying the maximum hourly PE limitation by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

c. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

d. Emission Limitation:

VOC emissions shall not exceed 1.2 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.

- e. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

- (1) None.



4. K006, small parts e-coat line

Operations, Property and/or Equipment Description:

small parts e-coat line, electrodeposition and drying oven (Terms in this permit supersede those identified in PTI 05-12594, issued 7/31/2003).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)h, d)(4), d)(5) and d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) content of the resin material employed in this emissions unit shall not exceed 0.5 lbs/gal, as employed. The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 lbs/gal, as employed. Visible particulate emissions (PE) from the stack shall not exceed 5% opacity. Emissions from natural gas combustion in the drying oven shall not exceed: 0.25 lb/hr and 1.07 TPY for NOx, 0.21 lb/hr and 0.91 TPY for CO, 0.005 lb/hr and 0.02 TPY for PE, 0.02 lb/hr and 0.06 TPY for VOC, 0.002 lb/hr and 0.01 TPY for SO2

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See section b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-18-06(A), 3745-21-08(B), 3745-23-06(B), and 3745-35-07(B).
b.	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input (for the drying oven).
d.	OAC rule 3745-18-06(A)	See section b)(2)b.
e.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
f.	OAC rules 3745-21-08(B) and 3745-23-06(B)	See section b)(2)c.
g.	OAC rule 3745-35-07(B)	VOC emissions shall not exceed 17.24 tons per rolling, 12-month summation. See section b)(2)d.
h.	OAC rule 3745-114-01	Ohio Toxics Policy.

(2) Additional Terms and Conditions

- a. The emission limitations for PE, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by

committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

- d. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

c) **Operational Restrictions**

- (1) The maximum annual resin material usage for this emissions unit shall not exceed 47,041 gallons, based upon a rolling, 12-month summation of the resin material usage figures.
- (2) The maximum annual paste material usage for this emissions unit shall not exceed 5,484 gallons, based upon a rolling, 12-month summation of the paste material usage figures.
- (3) The permittee shall burn only natural gas in this emissions unit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the VOC content of each resin material, as employed;
 - b. the volume of resin material employed, in gallons;
 - c. the rolling, 12-month summation of the resin material usage figures;
 - d. the VOC emissions for the resin materials employed, in tons, i.e., summation of (a x b) for each resin material employed divided by 2000 lbs/ton;
 - e. the VOC content of each paste material, as employed;
 - f. the volume of paste material employed, in gallons;

- g. the rolling, 12-month summation of the paste material usage figures;
 - h. the VOC emissions for the paste materials employed, in tons, i.e., summation of (e x f) for each paste material employed divided by 2000 lbs/ton;
 - i. the total VOC emissions for both the resin materials and the paste materials, in pounds or tons (d + h); and
 - j. the rolling, 12-month summation of the VOC emissions for this emissions unit.
- (3) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) The permit to install for this emissions unit K006 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: Methyl isobutyl ketone
- TLV (mg/m³): 205
- Maximum Hourly Emission Rate (lbs/hr): 0.29
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 894
- MAGLC (ug/m³): 4,881
- (5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (6) 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.
- e) Reporting Requirements
 - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation;
 - b. the rolling, 12-month resin material usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative resin material usage level; and
 - c. the rolling, 12-month paste material usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paste material usage level.
 - (3) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office, within 30 days following the end of the calendar month.
 - (4) The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

- (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. VOC Content Limitation:
- The VOC content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.
- The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.
- Applicable Compliance Method:
- Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.
- b. Emission Limitation:
- Visible PE from the stack shall not exceed 5% opacity.
- Applicable Compliance Method:
- If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.
- c. Emission Limitation:
- Emissions from natural gas combustion in the drying oven shall not exceed:
- 0.25 lb/hr and 1.07 TPY for nitrogen oxides (NO_x)
- 0.21 lb/hr and 0.91 TPY for carbon monoxide (CO)
- 0.005 lb/hr and 0.02 TPY for PE
- 0.02 lb/hr and 0.06 TPY for VOC
- 0.01 lb/hr and 0.01 TPY for sulfur dioxide (SO₂)
- Applicable Compliance Method:
- If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners

(2,451 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NOx/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM10/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO2/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

d. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

e. VOC Content Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section D)(1) of this permit.

f. Emission Limitation:

VOC emissions shall not exceed 17.24 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.

g. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.



5. K007, gecom tumbler

Operations, Property and/or Equipment Description:

gecom tumbler, tumble coating (Terms in this permit supersede those identified in PTI 05-12594, issued 7/31/2003)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d, d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(U)(2)(e), OAC rule 3745-35-07(B), and OAC rule 3745-114-01.

- (2) Additional Terms and Conditions
- a. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.
- The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.
- c) Operational Restrictions
- (1) The maximum annual coating usage for this emissions unit shall not exceed 1,095 gallons, based upon a rolling, 12-month summation of the coating usage figures.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records of the following information for this emissions unit:
- a. the name and identification number of each coating employed;
- b. the volume, in gallons, of each coating employed; and
- c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the name and identification of each coating, as applied;
- b. the VOC content of each coating, as applied, in pounds per gallon;
- c. the volume of each coating employed, in gallons;
- d. the rolling, 12-month summation of the coating usage figures;
- e. the total VOC emissions for all coatings employed, in tons, i.e., summation of (b x c) for each coating employed divided by 2000 lbs/ton; and
- f. the rolling, 12-month summation of the total VOC emissions for this emissions unit.
- (3) The permit to install for this emissions unit K007 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: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,274

MAGLC (ug/m³): 14,048

- (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 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 emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation of 3.32 tons; and
 - b. the rolling, 12-month coating usage limitation of 1,095 gallons.
- (3) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 3 gallons. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.1 pounds of VOC per gallon of coating, as applied

Applicable Compliance Method:

Compliance with the coating VOC content limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.
 - b. Emission Limitation:

VOC emissions shall not exceed 3.51 tons per rolling, 12-month summation.



Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit.

- c. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

- (1) None.



6. K008, cylinder paint machine

Operations, Property and/or Equipment Description:

Cylinder paint machine (Terms in this permit supersede those identified in PTI 05-12867, issued 9/11/2003)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 7.91 lbs/gal, as applied. The VOC content of the cleanup materials employed in this emissions unit shall not exceed 8.58 lbs/gal, as employed. The VOC emissions shall not exceed 14.49 TPY. Particulate emissions (PE) shall not exceed 0.02 lbs/hr or 0.06 TPY from coating activities. See section b)(2)a. Visible PE from the stack shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 5% opacity. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U).
b.	OAC rules 3745-17-07(A) and 3745-17-11(B)(2).	The limitations specified by these rules are less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-21-09(U)(2)(e)	The daily coating usage shall not exceed 10.0 gallons.

(2) Additional Terms and Conditions

- a. The 0.02 lb PE per hour limitation from coating activities reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) The permittee shall employ particulate filter panels as a control system for PE whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the VOC content of each coating, as applied, in pounds per gallon;
 - b. the name and identification of each cleanup material employed;
 - c. the volume, in gallons, of each cleanup material employed;
 - d. the VOC content, in pounds per gallon, of each cleanup material employed;
 - e. the VOC emissions for all the cleanup materials employed, prior to any credit for recovered materials, in tons, i.e., summation of © x d) for each cleanup material employed divided by 2000 lbs/ton;
 - f. the date the recovery tank was emptied;
 - g. the date the materials from the recovery tank were shipped off site;

- h. the number of gallons of materials from the recovery tank shipped off site;
 - i. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material (a composite sample of all drums is acceptable for purposes of this requirement);
 - j. the VOC from recovered materials, to be credited against the total VOC emissions from the cleanup materials employed, in tons, i.e., summation of (h x i) for each shipment divided by 2000 lbs/ton;
 - k. the net VOC emissions for all the cleanup materials employed, in tons, i.e., (e - j); and
 - l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
- (3) The permittee shall maintain records that document any time periods when the particulate filter panels serving this emissions unit are not in service while this emissions unit is operating.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall notify Ohio EPA, Southwest District Office in writing of any monthly record showing the use of any coating or cleanup material that exceeds the VOC content limitations of 7.91 lbs/gal and 8.58 lbs/gal, respectively. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 45 days following the end of the calendar month.
 - (3) The permittee shall notify Ohio EPA, Southwest District Office in writing of any daily record showing that the coating line employed more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 45 days after the exceedance occurs.
 - (4) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the particulate filter panels were not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 45 days after the event occurs.
 - (5) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
 - (6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

7.91 lbs VOC per gallon of coating, as applied

8.58 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section d)(2) of this permit.

b. Emission Limitation:

VOC emissions shall not exceed 14.49 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined through the record keeping requirements established in Section d)(2) of this permit. The annual VOC emissions are the sum of the monthly VOC emissions for the calendar year.

To determine the monthly VOC emissions from this emissions unit, the following equation may be used:

$$E = [(C)(C_{voc}) + (CI)(CI_{voc}) - (R)(R_{voc})] \div (2000 \text{ lbs/ton})$$

where:

E = VOC emissions rate, in tons per month

C = monthly coating, in gallons

C_{voc} = maximum coating VOC content of 7.91 lbs/gal

CI = monthly cleanup material usage, in gallons

CI_{voc} = maximum cleanup material VOC content of 8.58 lbs/gal

R = the number of gallons of materials from the recovery tank shipped off site, in gallons

R_{voc} = the VOC content of the material shipped off-site

c. Emission Limitation:

0.02 pound per hour and 0.06 ton per year PE for coating activities

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE from coating activities, the following equation may be used:

$$E = Cs(1 - TE)(1 - CE)$$

where:

E = PE rate, in pounds per hour

Cs = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The annual PE limitation was established by a similar equation with a maximum annual coating usage of 3,650 gallons, based upon 10 gallons per day and 365 days e per year. The resulting pounds of PE per year is then converted to tons by dividing by 2000 lbs/ton.

d. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

e. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

7. P004, hydrophilic mixing tank, 300 gallon

Operations, Property and/or Equipment Description:

hydrophilic mixing tank, 300 gallon stainless steel tank for batch mixing (Terms in this permit supersede those identified in PTI 05-12594, issued 7/31/2003).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d, d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 28.5 lbs/day or 5.2 TPY.</p> <p>Particulate emissions (PE) shall not exceed 10.7 lbs/day or 2.0 tons PE per rolling, 12-month summation.</p> <p>Visible PE from the stack shall not exceed 5% opacity.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).</p> <p>See section b)(2)a.</p>
b.	OAC rule 3745-21-07(G)(2)	See section b)(2)b.
c.	OAC rule 3745-35-07(B)	See section b)(2)c.
d.	OAC rule 3745-114-01	Ohio Toxics Policy.

(2) Additional Terms and Conditions

- a. The daily emission limitations for VOC, 28.5 pounds, and for PE, 10.7 pounds, are established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- c. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the name and identification of each solvent material, as employed; and
 - b. whether or not each liquid organic solvent material employed is a photochemically reactive material.
- (2) The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the number of pounds of each solid material employed;
 - b. the total PE rate for all solids employed, in pounds, i.e., (a)x(0.01, loss factor*);
*The 1%, by weight, loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.
 - c. the number of pounds of all solvent materials employed;
 - d. the total VOC emission rate for all solvents employed, in pounds, i.e., (d)(0.02, solvent loss factor*);

*The 2%, by weight, solvent loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

- (3) The permit to install for this emissions unit P004 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: Ethanol

TLV (mg/m³): 1,884

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 150

MAGLC (ug/m³): 44,863

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of

the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit annual reports to Ohio EPA, Southwest District Office, which specify the total VOC emissions (limitation of 5.2 tons/year) and the total particulate emissions (limitation of 2.0 tons). These reports shall be submitted by January 31 of each year.
 - (3) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office, within 30 days following the end of the calendar month.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

28.5 lbs VOC per day

Applicable Compliance Method:

The daily VOC emission rate was derived by multiplying the maximum solvent usage rate per batch, 475 pounds, by the maximum batches per day, three, then multiplying the product by the solvent loss factor of 2%. The 2%, by weight,

solvent loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

b. Emission Limitation:

5.2 tons VOC per year

2.0 tons PE per year

Applicable Compliance Method:

Compliance with the annual VOC and PE limitations shall be determined through the record keeping requirement established in Section d)(2) of this permit.

c. Emission Limitation:

10.7 lbs PE per day

Applicable Compliance Method:

The daily PE rate was derived by multiplying the maximum solids usage rate per batch, 365 pounds, by the maximum batches per day, three, and then multiplying the product by the particulate emission loss factor of 1%. The 1%, by weight, loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

d. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

e. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.