



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
LUCAS COUNTY
Application No: 04-1160**

CERTIFIED MAIL

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

DATE: October 6, 1999

Electro Prime, Inc
Kevin E Meade
4510 Lint Avenue Suite B
Toledo, OH 43612

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
TOLEDO DIVISION OF ENVIRONMENTAL SERVICES



Permit To Install

Issue Date: October 6, 1999

Terms and Conditions

Effective Date: October 6, 1999

FINAL PERMIT TO INSTALL 04-1160

Application Number: 04-1160

APS Premise Number: 0448010072

Permit Fee: **\$200**

Name of Facility: Electro Prime, Inc

Person to Contact: Kevin E Meade

Address: 4510 Lint Avenue Suite B

Toledo, OH 43612

Location of proposed air contaminant source(s) [emissions unit(s)]:

4510 Lint Avenue

Toledo, Ohio

Description of proposed emissions unit(s):

WATER-BASED ELECTROCATHODIC COATING LINE AND BAKE OVEN.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

Electro Prime, Inc

PTI Application: **04-1160**

October 6, 1999

Facility ID: **0448010072**

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Air Pollution Nuisance

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

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time

before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

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

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

7. Public Disclosure

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

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Best Available Technology

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

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.06
S02	0.02
N0x	3.07
CO	2.57
VOC	52.9
2-butoxyethanol	41.0
diethylene glycol monobutyl ether	3.98
ethylene glycol monohexyl ether	2.45

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
electro-cathodic water based coating line with 7 million Btu natural gas indirect fired curing oven for miscellaneous metal parts	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btus of actual heat input
	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-08(B)	See B.I.2.b below.
	OAC rule 3745-23-06(B)	See B.I.2.b below.

2. **Additional Terms and Conditions**

- 2.a Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- 2.b This emissions unit complies with best/latest available control techniques (at the time of installation) and operating practices by restricting the fuel burned in the oven to natural gas.

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied; and

- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day when a fuel other than natural gas was burned in this emissions unit.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
3. The permittee shall notify the Toledo Division of Environmental Services 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 Toledo Division of Environmental Services within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be demonstrated through the required monitoring and recordkeeping of section A.III.1. If required, compliance shall also be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

0.020 pound of particulate emissions per million Btus of actual heat input

Applicable Compliance Method:

Compliance shall be based upon a particulate emission factor of 1.9 pounds of particulate matter per million standard cubic feet, a heating value of 1020 Btus per standard cubic foot, and the monitoring and recordkeeping requirements of section A.III.1. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

- c. Emission Limitation:

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated through the required monitoring and recordkeeping of section A.III.2 as specified in OAC rule 3745-21-09(B)(3)(f). In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
electro-cathodic water based coating line with 7 million Btu natural gas indirect fired curing oven for miscellaneous metal parts	OAC rule 3745-31-05 (A)(3)	<p>For the coatings:</p> <p>0.8 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents, as a monthly volume-weighted average</p> <p>For the coatings and cleanup materials:</p> <p>12.04 lbs/hr of VOC 52.7 tpy of VOC</p> <p>0.91 lbs/hr of diethylene glycol monobutyl ether 3.98 tpy of diethylene glycol monobutyl ether See B.I.2.b below.</p> <p>9.36 lbs/hr of 2-butoxyethanol 41.0 tpy of 2-butoxyethanol See B.I.2.b below.</p> <p>0.56 lbs/hr of ethylene glycol monohexyl ether 2.45 tpy of ethylene glycol monohexyl ether See B.I.2.b below.</p> <p>For the oven burner exhaust:</p> <p>0.59 lb/hr of carbon monoxide (CO) 2.57 tpy of CO</p>

	0.70 lb/hr of nitrogen oxides (NOx) 3.07 tpy of NOx
	0.013 lb/hr of particulates 0.06 tpy of particulates
	0.004 lb/hr of sulfur dioxide (SO2) 0.02 tpy of SO2
	0.04 lb/hr of VOC 0.17 tpy of VOC

2. Additional Terms and Conditions

- 2.a** Ethylene glycol monohexyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether are VOCs. The emissions of these Hazardous Air Pollutants (HAPS) shall be included in the emissions calculations for VOC.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
 - c. the number of gallons of each coating material employed (excluding water and exempt solvents);
 - d. the monthly volume weighted-average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - e. the name and identification of each cleanup material employed;
 - f. the VOC content (excluding water and exempt solvents) of each cleanup material, in pounds

- per gallon;
- g. the number of gallons of each cleanup material employed (excluding water and exempt solvents);
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - i. the total number of hours the emissions unit was in operation; and,
 - j. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (h)/(i), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the line:
- a. the name and identification number of each coating, as applied;
 - b. the ethylene glycol monoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether content of each coating (excluding water and exempt solvents), as applied;
 - c. the number of gallons of each coating material employed (excluding water and exempt solvents);
 - d. the name and identification of each cleanup material employed;
 - e. the ethylene glycol monoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether content (excluding water and exempt solvents) of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed (excluding water and exempt solvents);
 - g. the total ethylene glycol monoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether emissions from all coatings and cleanup materials employed, in pounds or tons;
 - h. the total number of hours the emissions unit was in operation; and,
 - i. the average hourly ethylene glycol monoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether emission rate for all coatings and cleanup materials, i.e., (g)/(h), respectively, in pounds per hour (average).
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the monthly volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the average hourly VOC emissions rate from the coatings and cleanup materials exceeded 12.04 pounds per hour, and the actual average hourly VOC emissions for each such month;
 - b. an identification of each month during which the average hourly ethylene glycol monoethyl ether emissions rate from the coatings and cleanup materials exceeded 0.56 pounds per hour, and the actual average hourly ethylene glycol monoethyl ether emissions for each such month;
 - c. an identification of each month during which the average hourly 2-butoxyethanol emissions rate from the coatings and cleanup materials exceeded 9.36 pounds per hour, and the actual average hourly 2-butoxyethanol emissions for each such month; and,
 - d. an identification of each month during which the average hourly diethylene glycol monobutyl ether emissions rate from the coatings and cleanup materials exceeded 0.91 pounds per hour, and the actual average hourly ethylene glycol monobutyl ether emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.8 pound of VOC emitted per gallon of coating applied, excluding water and exempt solvents, as a monthly volume-weighted average

Applicable Compliance Method:

Compliance shall be demonstrated through the required monitoring and recordkeeping of section B.III.1*. VOC contents shall be determined in accordance with USEPA Methods 24 and 24A. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

*(For the resin, the lbs. VOC content determined by Method 24 shall be multiplied by 4.8 to obtain the lbs VOC actually emitted to account for any chemical cross linking emissions generated in the curing oven.)

b. Emission Limitation:

52.7 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through the required recordkeeping of section B.III.1. VOC contents shall be determined in accordance with USEPA Methods 24 and 24A. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. If required, the permittee shall also demonstrate compliance by Method 18, 25 or 25A of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

0.56 lb/hr of ethylene glycol monohexyl ether
2.45 tpy of ethylene glycol monohexyl ether

9.36 lbs/hr of 2-butoxyethanol
41.0 tpy of 2-butoxyethanol

0.91 lb/hr of diethylene glycol monobutyl ether
3.98 tpy of diethylene glycol monobutyl ether

Applicable Compliance Method:

Compliance shall be demonstrated through the required recordkeeping of section B.III.2*. The HAP concentrations shall be determined using formulation data. If required, the permittee shall also demonstrate compliance by Method 18 of 40 CFR Part 60, Appendix A.

*(For the resin, the lbs. 2-butoxyethanol determined by Method 24 shall be multiplied by 4.8 to obtain the lbs 2-butoxyethanol actually emitted to account for any chemical cross linking emissions generated in the curing oven.)

d. Emission Limitation:

0.59 lb/hr of CO
2.57 tpy of CO

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section B.III.3, an emission factor of 84 pounds of carbon monoxide per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

0.70 lb/hr of NOx
3.07 tpy of NOx

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section B.III.3, an emission factor of 100 pounds of nitrogen oxides per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

0.007 lb/hr of particulates
0.06 tpy of particulates

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 1.9 pounds of particulate matter per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and recordkeeping requirements of section B.III.3. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

0.004 lb/hr of SO₂
0.02 tpy of SO₂

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.6 pound of SO₂ per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and recordkeeping requirements of section B.III.3. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-18-04 (A), (F)(3), or (F)(4). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

0.04 lb/hr of VOC
0.17 tpy of VOC

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 5.5 pounds of total organic compounds per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and recordkeeping requirements of section B.III.3. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

VI. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for this PTI. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the 2-butoxyethanol emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: 2-butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 9.36

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 191.6

MAGLC (ug/m3): 2,881

2. As long as the application of the "Air Toxic Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:
 - a. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, 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 TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., reduction of exhaust gas flow rate, or decreased stack height);
 - c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.