OhioEPA

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: DRAFT PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01404

DATE: 9/12/2000

CERTIFIED MAIL

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

Hendrickson Trailer Suspension Systems
Frank Hezoucky
2070 Industrial Place SE
Canton, OH 44707-2600

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: **USEPA** **Canton LAA** **WV**
Stark Cty Area Trans Study **PA**

DRAFT PERMIT TO INSTALL 15-01404

Application Number:	15-01404
APS Premise Number:	1576051608
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Hendrickson Trailer Suspension Systems
Person to Contact:	Frank Hezoucky
Address:	2070 Industrial Place SE Canton, OH 44707-2600

Location of proposed air contaminant source(s) [emissions unit(s)]:
2070 Industrial Place SE
Canton, **Ohio**

Description of proposed emissions unit(s):
Surface coating of fabricated metal parts.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements 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 information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources 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.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	90
Single HAP	9.5
Total HAPS	23
Particulates	4.82

C:\temp\permits3\13688.wpd

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Paint spray booth with fiberglass filters for painting suspension components. This emissions unit was previously permitted under PTI 15-1299. This is a Chapter 31 modification which will allow the use of more automated spray equipment and is a synthetic minor permit.	OAC 3745-17-07	See A.2.a below.
	OAC 3745-17-11	0.551 lb/hr particulates
	OAC 3745-21-09; including but not limited to 3745-21-09 (U) (1) (c)	3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
	OAC 3745-31-05(A)(3)	2.41 tpy particulates 22.1 lbs/hr VOC (See A.2.b) The requirements of this rule also include compliance with the requirements of OAC 3745-17-07, OAC 3745-17-11, OAC 3745-21-09 and OAC 3745-35-07(B).
	OAC 3745-35-07(B)	45 tons VOC per rolling 365-day period; 4.75 tons Single HAP per rolling 365-day period; 11.5 tons Total HAPS per rolling 365-day period Coating and cleanup solvent usage restrictions - see Section B below.

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2.b This limitation was established using the maximum coating content and usage.

C:\temp\permits3\13688.wpd

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 24,286 gallons, based upon a rolling, 365-day summation of the coating usage figures.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	12,143
1-2	13,247
1-3	14,351
1-4	15,455
1-5	16,559
1-6	17,663
1-7	18,767
1-8	19,871
1-9	20,975
1-10	22,079
1-11	23,183
1-12	24,286

   After the first 12 calendar months of operation after issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage figures.

2. The maximum annual cleanup usage for this emissions unit shall not exceed 1429 gallons (with a 50% recovery rate, i.e. assume 714.5 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures.

3. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for VOC emissions:

   $B_1 + B_2 + ... + B_n$ = 24,286 gallons of coating per rolling, 365-day period;

   $D_1 + D_2 + ... + D_n$ = 714.5 gallons of cleanup evaporated per rolling, 365-day period; and

   $(A_1 B_1 + A_2 B_2 + ... + A_n B_n)$ X (1/2000) + $(C_1 D_1 + C_2 D_2 + ... + C_n D_n)$ X (1/2000)

   = 45 tons of VOC per rolling, 365-day period

C:\temp\permits3\13688.wpd

where:

n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of VOC per volume of each different coating, as applied, in units of pounds VOC per gallon;
B_n	=	Volume of each different coating, as applied, in units of gallons per year;
C_n	=	Mass of VOC per volume of each different cleanup, as applied, in units of pounds VOC per gallon; and
D_n	=	Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

4. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for any Single HAP emission:

$B_1 + B_2 + ... + B_n$ = 24,286 gallons of coating per rolling, 365-day period;

$D_1 + D_2 + ... + D_n$ = 714.5 gallons of cleanup evaporated per rolling, 365-day period; and

$(A_1 B_1 + A_2 B_2 + ... + A_n B_n)$ X (1/2000) + $(C_1 D_1 + C_2 D_2 + ... + C_n D_n)$ X (1/2000)

= 4.75 tons of any Single HAP per rolling, 365-day period

where:

n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of Single HAP per volume of each different coating, as applied, in units of pounds Single HAP per gallon;
B_n	=	Volume of each different coating, as applied, in units of gallons per year;
C_n	=	Mass of Single HAP per volume of each different cleanup, as applied, in units of pounds Single HAP per gallon; and
D_n	=	Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

5. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for Total HAP emissions:

C:\temp\permits3\13688.wpd

$B_1 + B_2 + ... + B_n$ = 24,286 gallons of coating per rolling, 365-day period;

$D_1 + D_2 + ... + D_n$ = 714.5 gallons of cleanup evaporated per rolling, 365-day period; and

$(A_1 B_1 + A_2 B_2 + ... + A_n B_n)$ X (1/2000) + $(C_1 D_1 + C_2 D_2 + ... + C_n D_n)$ X (1/2000)

= 11.5 tons of Total HAPs per rolling, 365-day period

where:

n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of Total HAPs per volume of each different coating, as applied, in units of pounds Total HAPs per gallon;
B_n	=	Volume of each different coating, as applied, in units of gallons per year;
C_n	=	Mass of Total HAPs per volume of each different cleanup, as applied, in units of pounds Total HAPs per gallon; and
D_n	=	Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information:

   a. the coating and cleanup usage rates (in gallons/day) for each day; and

   b. beginning after the first 12 calendar months of operation after issuance of this permit, the rolling, 365-day summation of the coating and cleanup usage figures.

   Also, during the first 12 calendar months of operation after issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

2. The permittee shall collect and record the following information each day for this emissions unit:

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating, as applied;

   c. the number of gallons of each coating employed;

   d. the VOC emissions from all coatings employed, in pounds per day;

   e. the name and identification of the cleanup solvent employed;

C:\temp\permits3\13688.wpd

f. the VOC content of the cleanup solvent, in weight percent VOC;

g. the amount (in gallons) of cleanup solvent(s) used, the amount recycled, and the difference between the amount used and the amount recycled (which is the amount emitted);

h. the VOC emissions from all cleanup materials employed based on the result of C.2.g above, in pounds per day; and

i. the total combined rolling, 365-day summation of VOC emissions from both coatings and cleanup materials employed (sum of C.2.d and C.2.h above), in pounds per year and tons per year.

3. The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

c. the total HAP content for each HAP of each coating in pounds of total HAPS per gallon of coating, as applied (sum of all the individual HAP contents from C.3.b above);

d. the amount (in gallons) of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total HAP content of each cleanup material in pounds of total HAPs per gallon of cleanup material, as applied (sum of all the individual HAP contents from C.3.f above);

h. the amount (in gallons) of each cleanup material employed;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds per day (for each HAP, the sum of C.3.b times C.3.d for each coating and the sum of C.3.f times C.3.h for each cleanup material);

j. the total HAP emissions from all coatings and cleanup materials employed, in pounds per day (the sum of C.3.c times C.3.d for each coating plus the sum of C.3.g times C.3.h for each cleanup material);

k. the total combined rolling, 365-day summation of each individual HAP emission from both coatings and cleanup materials employed, in pounds per year and tons per year; and

C:\temp\permits3\13688.wpd

l. the total combined rolling, 365-day summation of Total HAP emissions from both coatings and cleanup materials employed, in pounds per year and tons per year.

4. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

5. Air Toxic Policy Clarifying Language

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. The emissions unit was evaluated based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the 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 SREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

a. The following summarizes the results of the modeling for each pollutant due to coating usage:

Pollutant: VM&P Naptha

TLV ($\mu g/m^3$): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 13.11

Predicted 1-Hour Maximum Ground-Level
Concentration ($\mu g/m^3$): 1100

MAGLC ($\mu g/m^3$): 32,619

Pollutant: toluene

TLV ($\mu g/m^3$): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 1.7

C:\temp\permits3\13688.wpd

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 143

MAGLC (µg/m^3): 4,476

Pollutant: butyl acetate

TLV (µg/m^3): 713

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 81

MAGLC (µg/m^3): 16,976

Pollutant: methyl propyl ketone

TLV (µg/m^3): 705

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.89

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 75

MAGLC (µg/m^3): 16,786

b. The following summarizes the results of the modeling for each pollutant due to cleanup usage:

Pollutant: toluene

TLV (µg/m^3): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 24.1

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 2023

MAGLC (µg/m^3): 4476

Pollutant: VM&P Naptha

TLV (µg/m^3): 1370

C:\temp\permits3\13688.wpd

Maximum Hourly Modeled Emission Rate (lbs/hr): 16.85

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 1414

MAGLC (µg/m^3): 32,619

Pollutant: acetone

TLV (µg/m^3): 1780

Maximum Hourly Modeled Emission Rate (lbs/hr): 14.45

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 1213

MAGLC (µg/m^3): 42,381

Pollutant: isopropyl alcohol

TLV (µg/m^3): 983

Maximum Hourly Modeled Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 609

MAGLC (µg/m^3): 23,405

Pollutant: methyl ethyl ketone

TLV (µg/m^3): 590

Maximum Hourly Modeled Emission Rate (lbs/hr): 4.85

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m^3): 407

MAGLC (µg/m^3): 14,048

Pollutant: xylene

TLV (µg/m^3): 434

Maximum Hourly Modeled Emission Rate (lbs/hr): 2.4

C:\temp\permits3\13688.wpd

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 201

MAGLC (µg/m^3): 10,333

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 permitttee 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.

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.

C:\temp\permits3\13688.wpd

D. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of the use of noncomplying coatings. A noncomplying coating contains more than 3.50 pounds of VOC per gallon of coating excluding water and exempt solvents as applied. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 30 days following the end of the calendar month in which the deviation occurred.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels identified in Section A.1 for each month. The deviation report shall be submitted within 45 days after the exceedance occurred.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day cleanup usage limitation. The deviation report shall be submitted within 45 days after the exceedance occurred.

4. The permittee shall submit an annual report which specifies the VOC emissions (in pounds and tons) from the coating operations, the VOC emissions from the use of cleanup solvent, and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall submit an annual report which specifies the individual HAP and total HAP emissions (in pounds and tons) from the coating operations and the individual HAP and total HAP emissions from the use of cleanup solvent for the previous calendar year. These reports shall be submitted by January 31 of each year.

6. The permittee shall submit semiannual written reports which:

   a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

   b. describe any corrective actions taken to eliminate the visible particulate emissions.

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

7. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

C:\temp\permits3\13688.wpd

E. Testing Requirements

1. Compliance with the permit allowable mass emissions and/or control usage requirements in the air emission summary of this permit to install shall be determined in accordance with the following methods:

   a. Emission Limitation:

      Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

      Applicable Compliance Method

      If required, compliance shall be determined by performing visible emissions observations using Method 9 of 40 CFR Part 60, Appendix A.

   b. Emission Limitation

      0.551 lb/hr particulate

      Applicable Compliance Method

      If required, compliance shall be determined by performing a stack test using Method 5 of 40 CFR Part 60, Appendix A.

   c. Emission Limitation

      2.41 tpy particulates

      Applicable Compliance Method

      The ton per year limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly particulate limitation, compliance will also be shown with the annual limitation.

   d. Emission Limitation

      3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied

      Applicable Compliance Method

      Compliance shall be performed in accordance with OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant

C:\temp\permits3\13688.wpd

to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, 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.

e. Emission Limitation

45 tons VOC per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total VOC's emitted per rolling 365-day period from coating and cleanup operations combined as follows:

$$VOC = (A_1 B_1 + A_2 B_2 + ... + A_n B_n) \text{ X } (1/2000) + (C_1 D_1 + C_2 D_2 + ... + C_n D_n) \text{ X } (1/2000)$$

where:

VOC	=	Total VOC emissions from coating operations in units of tons of VOC per year;
n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of VOC per volume of coating, as applied, in units of pounds VOC per gallon;
B_n	=	Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C_n	=	Mass of VOC per volume of cleanup, as applied, in units of pounds VOC per gallon;
D_n	=	Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

f. Emission Limitation

4.75 tons of any single HAP per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total Single HAP emitted per rolling 365-day period from coating and cleanup operations as follows:

$$S\text{-}HAP = (A_1 B_1 + A_2 B_2 + ... + A_n B_n) \text{ X } (1/2000) + (C_1 D_1 + C_2 D_2 + ... + C_n D_n) \text{ x } (1/2000)$$

C:\temp\permits3\13688.wpd

where:

S-HAP = Total for any given Single HAP emissions from coating and cleanup operation in units of tons of Single HAP per year;
n = Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n = Mass of Single HAP per volume of coating as applied, in units of pounds Single HAP per gallon; and
B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C_n = Mass of Single HAP per volume of cleanup, as applied, in units of pounds Single HAP per gallon; and
D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

g. Emission Limitation

11.5 tons of Total HAPS per rolling, 365-day period from coating and cleanup operations

Applicable Compliance Method

Calculate the total HAPS emitted per rolling, 365-day period from coating operations

$$\text{T-HAPS} = (A_1 B_1 + A_2 B_2 + ... + A_n B_n) \text{ X } (1/2000) + (C_1 D_1 + C_2 D_2 + ... + C_n D_n) \text{ x } (1/2000)$$

where:

T-HAPS = Total HAPS emissions from coating operations in units of tons of HAPS per year;
n = Number of either the different coatings or cleanup matereials applied in this emissions unit;
A_n = Mass of Total HAPS per volume of coating as applied, in units of pounds Total HAPS per gallon;
B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C_n = Mass of Total HAPS per volume of cleanup, as applied, in units of pounds Total HAPS per gallon; and
D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

C:\temp\permits3\13688.wpd

h. Coating Usage Limitation

The maximum annual coating usage for this emissions unit shall not exceed 24,286 gallons, based upon a rolling, 365-day summation of the coating usage figures, and the usage restrictions contained in Sections B.3, B.4, and B.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections C and D of this permit.

i. Cleanup Usage Limitation

The maximum annual cleanup usage for this emissions unit shall not exceed 1429 gallons (with a 50% recovery rate, i.e. assume 714.5 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures, and the usage restrictions contained in Sections B.3, B.4, and B.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections C and D of this permit.

F. Miscellaneous Requirements

None.

C:\temp\permits3\13688.wpd

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Surface coating of fabricated metal parts. Paint spray booth with fiberglass filters for painting suspension components. This is a new installation.	OAC 3745-17-07	See A.2.a below
	OAC 3745-17-11	0.551 lb/hr particulates
	OAC 3745-21-09; including but not limited to 3745-21-09 (U) (1) (c)	3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
	OAC 3745-31-05(A)(3)	2.41 tpy particulates 22.1 lbs/hr VOC (See A.2.b) The requirements of this rule also include compliance with the requirements of OAC 3745-17-07, OAC 3745-17-11, OAC 3745-21-09 and OAC 3745-35-07(B).
	OAC 3745-35-07(B)	45 tons VOC per rolling 365-day period; 4.75 tons Single HAP per rolling 365-day period; 11.5 tons Total HAPS per rolling 365-day period Coating and cleanup solvent usage restrictions - see Section B below.

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2.b This limitation was established using the maximum coating content and usage.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 24,286 gallons, based upon a rolling, 365-day summation of the coating usage figures.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	12,143
1-2	13,247
1-3	14,351
1-4	15,455
1-5	16,559
1-6	17,663
1-7	18,767
1-8	19,871
1-9	20,975
1-10	22,079
1-11	23,183
1-12	24,286

   After the first 12 calendar months of operation after issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage figures.

2. The maximum annual cleanup usage for this emissions unit shall not exceed 1429 gallons (with a 50% recovery rate, i.e. assume 714.5 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures.

3. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for VOC emissions:

   $B_1 + B_2 + ... + B_n$ = 24,286 gallons of coating per rolling, 365-day period;

   $D_1 + D_2 + ... + D_n$ = 714.5 gallons of cleanup evaporated per rolling, 365-day period; and

   $(A_1 B_1 + A_2 B_2 + ... + A_n B_n)$ X (1/2000) + $(C_1 D_1 + C_2 D_2 + ... + C_n D_n)$ X (1/2000)

= 45 tons of VOC per rolling, 365-day period

where:

n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of VOC per volume of each different coating, as applied, in units of pounds VOC per gallon;
B_n	=	Volume of each different coating, as applied, in units of gallons per year;
C_n	=	Mass of VOC per volume of each different cleanup, as applied, in units of pounds VOC per gallon; and
D_n	=	Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

4. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for any Single HAP emission:

$B_1 + B_2 + ... + B_n$ = 24,286 gallons of coating per rolling, 365-day period;

$D_1 + D_2 + ... + D_n$ = 714.5 gallons of cleanup evaporated per rolling, 365-day period; and

$(A_1 B_1 + A_2 B_2 + ... + A_n B_n)$ X (1/2000) + $(C_1 D_1 + C_2 D_2 + ... + C_n D_n)$ X (1/2000)

= 4.75 tons of any Single HAP per rolling, 365-day period

where:

n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of Single HAP per volume of each different coating, as applied, in units of pounds Single HAP per gallon;
B_n	=	Volume of each different coating, as applied, in units of gallons per year;
C_n	=	Mass of Single HAP per volume of each different cleanup, as applied, in units of pounds Single HAP per gallon; and
D_n	=	Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

5. The maximum usage restrictions denoted in items A.1 and A.2 above shall be further restricted by the following formulas to ensure that emissions do not exceed the Title V threshold for Total HAP emissions:

$B_1 + B_2 + ... + B_n$ = 24,286 gallons of coating per rolling, 365-day period;

$D_1 + D_2 + ... + D_n$ = 714.5 gallons of cleanup evaporated per rolling, 365-day period; and

$(A_1 B_1 + A_2 B_2 + ... + A_n B_n)$ X (1/2000) + $(C_1 D_1 + C_2 D_2 + ... + C_n D_n)$ X (1/2000)

= 11.5 tons of Total HAPs per rolling, 365-day period

where:

n	=	Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n	=	Mass of Total HAPs per volume of each different coating, as applied, in units of pounds Total HAPs per gallon;
B_n	=	Volume of each different coating, as applied, in units of gallons per year;
C_n	=	Mass of Total HAPs per volume of each different cleanup, as applied, in units of pounds Total HAPs per gallon; and
D_n	=	Volume of each different cleanup which evaporated, as applied, in units of gallons per year (this is equal to the total amount of each cleanup used x 50% recovery rate).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information:

   a. the coating and cleanup usage rates (in gallons/day) for each day; and

   b. beginning after the first 12 calendar months of operation after issuance of this permit, the rolling, 365-day summation of the coating and cleanup usage figures.

   Also, during the first 12 calendar months of operation after issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

2. The permittee shall collect and record the following information each day for this emissions unit:

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating, as applied;

   c. the number of gallons of each coating employed;

   d. the VOC emissions from all coatings employed, in pounds per day;

   e. the name and identification of the cleanup solvent employed;

   f. the VOC content of the cleanup solvent, in weight percent VOC;

   g. the amount (in gallons) of cleanup solvent(s) used, the amount recycled, and the difference between the amount used and the amount recycled (which is the amount emitted);

h. the VOC emissions from all cleanup materials employed based on the result of C.2.g above, in pounds per day; and

i. the total combined rolling, 365-day summation of VOC emissions from both coatings and cleanup materials employed (sum of C.2.d and C.2.h above), in pounds per year and tons per year.

3. The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

c. the total HAP content for each HAP of each coating in pounds of total HAPS per gallon of coating, as applied (sum of all the individual HAP contents from C.3.b above);

d. the amount (in gallons) of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total HAP content of each cleanup material in pounds of total HAPs per gallon of cleanup material, as applied (sum of all the individual HAP contents from C.3.f above);

h. the amount (in gallons) of each cleanup material employed;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds per day (for each HAP, the sum of C.3.b times C.3.d for each coating and the sum of C.3.f times C.3.h for each cleanup material);

j. the total HAP emissions from all coatings and cleanup materials employed, in pounds per day (the sum of C.3.c times C.3.d for each coating plus the sum of C.3.g times C.3.h for each cleanup material);

k. the total combined rolling, 365-day summation of each individual HAP emission from both coatings and cleanup materials employed, in pounds per year and tons per year; and

l. the total combined rolling, 365-day summation of Total HAP emissions from both coatings and cleanup materials employed, in pounds per year and tons per year.

4. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions

unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

5. Air Toxic Policy Clarifying Language

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. The emissions unit was evaluated based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the 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 SREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

a. The following summarizes the results of the modeling for each pollutant due to coating usage:

Pollutant: VM&P Naptha

TLV (µg/m^3): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 13.11

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 1315

MAGLC (µg/m^3): 32,619

Pollutant: toluene

TLV (µg/m^3): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 171

MAGLC (µg/m^3): 4,476

Pollutant: butyl acetate

TLV (µg/m^3): 713

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 97

MAGLC (µg/m^3): 16,976

Pollutant: methyl propyl ketone

TLV (µg/m^3): 705

Maximum Hourly Modeled Emission Rate (lbs/hr): 0.89

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 89

MAGLC (µg/m^3): 16,786

b. The following summarizes the results of the modeling for each pollutant due to cleanup usage:

Pollutant: toluene

TLV (µg/m^3): 188

Maximum Hourly Modeled Emission Rate (lbs/hr): 24.1

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 2418

MAGLC (µg/m^3): 4476

Pollutant: VM&P Naptha

TLV (µg/m^3): 1370

Maximum Hourly Modeled Emission Rate (lbs/hr): 16.85

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 1690

MAGLC (µg/m^3): 32,619

Pollutant: acetone

TLV ($\mu g/m^3$): 1780

Maximum Hourly Modeled Emission Rate (lbs/hr): 14.45

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 1450

MAGLC ($\mu g/m^3$): 42,381

Pollutant: isopropyl alcohol

TLV ($\mu g/m^3$): 983

Maximum Hourly Modeled Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 727

MAGLC ($\mu g/m^3$): 23,405

Pollutant: methyl ethyl ketone

TLV ($\mu g/m^3$): 590

Maximum Hourly Modeled Emission Rate (lbs/hr): 4.85

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 487

MAGLC ($\mu g/m^3$): 14,048

Pollutant: xylene

TLV ($\mu g/m^3$): 434

Maximum Hourly Modeled Emission Rate (lbs/hr): 2.4

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 241

MAGLC ($\mu g/m^3$): 10,333

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 permitttee 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy"::

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of the use of noncomplying coatings. A noncomplying coating contains more than 3.50 pounds of VOC per gallon of coating excluding water and exempt solvents as applied. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 30 days following the end of the calendar month in which the deviation occurred.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day coating usage limitation and, for the first 12 claendar months of operation following

the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels identified in Section A.1 for each month. The deviation report shall be submitted within 45 days after the exceedance occurred.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day cleanup usage limitation. The deviation report shall be submitted within 45 days after the exceedance occurred.

4. The permittee shall submit an annual report which specifies the VOC emissions (in pounds and tons) from the coating operations, the VOC emissions from the use of cleanup solvent, and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall submit an annual report which specifies the individual HAP and total HAP emissions (in pounds and tons) from the coating operations and the individual HAP and total HAP emissions from the use of cleanup solvent for the previous calendar year. These reports shall be submitted by January 31 of each year.

6. The permittee shall submit semiannual written reports which:

   a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

   b. describe any corrective actions taken to eliminate the visible particulate emissions.

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

7. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

E. Testing Requirements

1. Compliance with the permit allowable mass emissions and/or control usage requirements in the air emission summary of this permit to install shall be determined in accordance with the following methods:

   a. Emission Limitation:

      Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

      Applicable Compliance Method

      If required, compliance shall be determined by performing visible emissions observations using Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation

0.551 lb/hr particulate

Applicable Compliance Method

If required, compliance shall be determined by performing a stack test using Method 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation

2.41 tpy particulates

Applicable Compliance Method

The ton per year limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly particulate limitation, compliance will also be shown with the annual limitation.

d. Emission Limitation

3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied

Applicable Compliance Method

Compliance shall be performed in accordance with OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, 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.

e. Emission Limitation

45 tons VOC per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total VOC's emitted per rolling 365-day period from coating and cleanup operations combined as follows:

$$VOC = (A_1 B_1 + A_2 B_2 + ... + A_n B_n) \text{ X } (1/2000) + (C_1 D_1 + C_2 D_2 + ... + C_n D_n) \text{ X } (1/2000)$$

where:

VOC = Total VOC emissions from coating operations in units of tons of VOC per year;
n = Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n = Mass of VOC per volume of coating, as applied, in units of pounds VOC per gallon;
B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C_n = Mass of VOC per volume of cleanup, as applied, in units of pounds VOC per gallon;
D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

f. Emission Limitation

4.75 tons of any single HAP per rolling, 365-day period from coating and cleanup operations combined

Applicable Compliance Method

Calculate the total Single HAP emitted per rolling 365-day period from coating and cleanup operations as follows:

$$\text{S-HAP} = (A_1 B_1 + A_2 B_2 + ... + A_n B_n) \text{ X } (1/2000) + (C_1 D_1 + C_2 D_2 + ... + C_n D_n) \text{ x } (1/2000)$$

where:

S-HAP = Total for any given Single HAP emissions from coating and cleanup operation in units of tons of Single HAP per year;
n = Number of either the different coatings or cleanup materials applied in this emissions unit;
A_n = Mass of Single HAP per volume of coating as applied, in units of pounds Single HAP per gallon; and
B_n = Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C_n = Mass of Single HAP per volume of cleanup, as applied, in units of pounds Single HAP per gallon; and
D_n = Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

g. Emission Limitation

11.5 tons of Total HAPS per rolling, 365-day period from coating and cleanup operations

Applicable Compliance Method

Calculate the total HAPS emitted per rolling, 365-day period from coating operations

$$\text{T-HAPS} = (A_1 B_1 + A_2 B_2 + ... + A_n B_n) \text{ X } (1/2000) + (C_1 D_1 + C_2 D_2 + ... + C_n D_n) \text{ x } (1/2000)$$

where:

T-HAPS	=	Total HAPS emissions from coating operations in units of tons of HAPS per year;
n	=	Number of either the different coatings or cleanup matereials applied in this emissions unit;
A_n	=	Mass of Total HAPS per volume of coating as applied, in units of pounds Total HAPS per gallon;
B_n	=	Volume of coating, as applied, in units of gallons per rolling, 365-day period;
C_n	=	Mass of Total HAPS per volume of cleanup, as applied, in units of pounds Total HAPS per gallon; and
D_n	=	Volume of cleanup, as applied, in units of gallons per rolling, 365-day period.

h. Coating Usage Limitation

The maximum annual coating usage for this emissions unit shall not exceed 24,286 gallons, based upon a rolling, 365-day summation of the coating usage figures, and the usage restrictions contained in Sections B.3, B.4, and B.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections C and D of this permit.

i. Cleanup Usage Limitation

The maximum annual cleanup usage for this emissions unit shall not exceed 1429 gallons (with a 50% recovery rate, i.e. assume 714.5 gallons evaporated), based upon a rolling, 365-day summation of the cleanup usage figures, and the usage restrictions contained in Sections B.3, B.4, and B.5 of this permit.

Applicable Compliance Method

Record keeping and reporting in accordance with Sections C and D of this permit.

F. Miscellaneous Requirements

None.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

SIC CODE 3714 SCC CODE 40200101 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Paint spray booth with fiberglass filters for painting suspension components. This is a Chapter 31 modification.

DATE INSTALLED 08/97

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.17 lb/hr	0.75	0.551 lb/hr	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds	Attainment			3.5 lbs VOC/gal	45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics Single HAP Total HAPs	Attainment				 4.25 11.5

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Limit of VOC content of coatings, and coating & cleanup usage limitations. Limit coating to 3.5 lbs VOC/gal less water in accordance with OAC Rule 3745-21-09(U)(1)(c). Fiberglass filters for particulate control.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes indeed.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: VM&P; toluene; butyl acetate; MPK; naptha; acetone; isopropyl alcohol; MEK; and xylene.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

SIC CODE 3714 SCC CODE 40200101 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Paint spray booth with fiberglass filters for painting suspension components. This is a new installation.

DATE INSTALLED May, 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.17	0.75	0.551	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment			3.5 lbs VOC/gal	45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics Single HAP Total HAP	attainment				 4.25 11.5

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Limit of VOC content of coatings, and coating & cleanup usage limitations. Limit coating to 3.5 lbs VOC/gal less water in accordance with OAC Rule 3745-21-09(U)(1)(c). Fiberglass filters for particulate control.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes indeed.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: VM&P; toluene; butyl acetate; MPK; naptha; acetone; isopropyl alcohol; MEK; and xylene

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

SIC CODE 3714 SCC CODE EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Paint spray booth with fiberglass filters for painting suspension components. This is a new installation.

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Emissions calculations and modeling output for air toxics.

Please provide any additional permit specific notes as you deem necessary:

This is a Chapter 31 modification for emissions unit K001 which was previously permitted under PTI #15-1299. This permit also includes emissions unit K002 which is a new installation.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

Permit To Install Synthetic Minor Write-Up

Hendrickson Trailer Suspension Systems
Synthetic Minor Writeup
For the purpose of avoiding
the Title V Requirements
PTI #15-01404

(A)Source Description

Hendrickson Trailer Suspension Systems (Hendrickson) operates a paint spray booth (K001) for the painting of suspension components. Hendrickson modified emissions unit K001 in 1997. This emissions unit was initially permitted under Permit to Install #15-1050. The modification resulted in the issuance of PTI #15-1299 with an allowable VOC limit of 30 tpy, Single HAP 9.46 tpy, and Total HAPs 16.9 tpy.

This project involves the second modification of emissions unit K001 and the installation of a new spray booth (K002). This second modification will allow an increase in the amount of coating and cleanup usage, and hence an increase in total VOC and total combined HAP emissions. The Single HAP allowable limit will still remain below 9.5 tpy.

(B)Facility Emissions / Attainment Status

Hendrickson is located in the city of Canton which is in Stark County. The main pollutants of concern for Hendrickson volatile organic compounds (VOCs), Single HAPs (toluene), and Total HAPs. Prior to the modifications, Hendrickson was classified as a “minor source” for PSD purposes since the potential to emit VOCs was less than 250 tons per year. In addition, for Title V purposes, the potential to emit, prior to the modification, VOCs was less than 100 tpy, and the PTE for a single HAP was less than 10 tpy, and the PTE for combined HAPs was less than 25 tpy.

Stark County is currently designated as attainment for each of the criteria pollutants.

(C)New Source Review Emissions

Due to the modification, the maximum potential annual coating usage for both spray booths will increase to 55,276 gallons. Since the PTE for toluene will exceed the 10 tpy Title V applicability threshold and the PTE for VOC emissions will exceed the 100 tpy Title V threshold at this usage rate, it is necessary to incorporate federally enforceable restrictions to maintain emissions below the Title V applicability thresholds.

The proposed Permit to Install modification will contain an operational restriction which will restrict the amount of coatings and cleanup materials used on a rolling, 365-day basis. Each emissions unit (K001 and K002) will be restricted to the use of no more than 24,286 gallons of coating per year, and 1429 gallons of cleanup material per year (with a 50% recovery rate for cleanup materials).

With the above restriction incorporated into this pending permit, the allowable VOC emission limit will be 90 tpy - combined total for cleanup and coating usage. The emission rate for any Single HAP will be restricted to less than 9.5 tpy, and the emission rate for combined HAPs will be restricted to less than 23 tpy.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

(D)Conclusions

Since the modifications associated with emissions unit K001 at Hendrickson will not result in potential emissions which either trigger the PSD requirements or exceed the Title V applicability thresholds, Hendrickson will not be subject to either PSD or Title V.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	90
Single HAP	9.5
Total HAPS	23
Particulates	4.82

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Emissions calculations and modeling output for air toxics.

Please provide any additional permit specific notes as you deem necessary:

This is a Chapter 31 modification for emissions unit K001 which was previously permitted under PTI #15-1299. This permit also includes emissions unit K002 which is a new installation.

Permit To Install Synthetic Minor Write-Up

Hendrickson Trailer Suspension Systems
Synthetic Minor Writeup
For the purpose of avoiding
the Title V Requirements
PTI #15-01404

(A)Source Description

Hendrickson Trailer Suspension Systems (Hendrickson) operates a paint spray booth (K001) for the painting of suspension components. Hendrickson modified emissions unit K001 in 1997. This emissions unit was initially permitted under Permit to Install #15-1050. The modification resulted in the issuance of PTI #15-1299 with an allowable VOC limit of 30 tpy, Single HAP 9.46 tpy, and Total HAPs 16.9 tpy.

This project involves the second modification of emissions unit K001 and the installation of a new spray booth (K002). This second modification will allow an increase in the amount of coating and cleanup usage, and hence an increase in total VOC and total combined HAP emissions. The Single HAP allowable limit will still remain below 9.5 tpy.

(B)Facility Emissions / Attainment Status

Hendrickson is located in the city of Canton which is in Stark County. The main pollutants of concern for Hendrickson volatile organic compounds (VOCs), Single HAPs (toluene), and Total HAPs. Prior to the modifications, Hendrickson was classified as a “minor source” for PSD purposes since the potential to emit VOCs was less than 250 tons per year. In addition, for Title V purposes, the potential to emit, prior to the modification, VOCs was less than 100 tpy, and the PTE for a single HAP was less than 10 tpy, and the PTE for combined HAPs was less than 25 tpy.

Stark County is currently designated as attainment for each of the criteria pollutants.

(C)New Source Review Emissions

Due to the modification, the maximum potential annual coating usage for both spray booths will increase to 55,276 gallons. Since the PTE for toluene will exceed the 10 tpy Title V applicability threshold and the PTE for VOC emissions will exceed the 100 tpy Title V threshold at this usage rate, it is necessary to incorporate federally enforceable restrictions to maintain emissions below the Title V applicability thresholds.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton

The proposed Permit to Install modification will contain an operational restriction which will restrict the amount of coatings and cleanup materials used on a rolling, 365-day basis. Each emissions unit (K001 and K002) will be restricted to the use of no more than 24,286 gallons of coating per year, and 1429 gallons of cleanup material per year (with a 50% recovery rate for cleanup materials).

With the above restriction incorporated into this pending permit, the allowable VOC emission limit will be 90 tpy - combined total for cleanup and coating usage. The emission rate for any Single HAP will be restricted to less than 9.5 tpy, and the emission rate for combined HAPs will be restricted to less than 23 tpy.

(D)Conclusions

Since the modifications associated with emissions unit K001 at Hendrickson will not result in potential emissions which either trigger the PSD requirements or exceed the Title V applicability thresholds, Hendrickson will not be subject to either PSD or Title V.

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	90
Single HAP	9.5
Total HAPS	23
Particulates	4.82

NEW SOURCE REVIEW FORM B

PTI Number: 15-01404 Facility ID: 1576051608

FACILITY NAME Hendrickson Trailer Suspension Systems

FACILITY DESCRIPTION Surface coating of fabricated metal parts. CITY/TWP Canton