



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
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Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
GEAUGA COUNTY
Application No: 02-19306
Fac ID: 0228000213**

CERTIFIED MAIL

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

DATE: 10/7/2004

Kraftmaid Cabinetry Inc
Tim More
PO Box 1055 15535 South State Ave.
Middlefield, OH 440621055

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/7/2004
Effective Date: 10/7/2004**

FINAL PERMIT TO INSTALL 02-19306

Application Number: 02-19306
Facility ID: 0228000213
Permit Fee: **\$500**
Name of Facility: Kraftmaid Cabinetry Inc
Person to Contact: Tim More
Address: PO Box 1055 15535 South State Ave.
Middlefield, OH 440621055

Location of proposed air contaminant source(s) [emissions unit(s)]:
**15535 S State Ave
Middlefield, Ohio**

Description of proposed emissions unit(s):
UV Line No. 3.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or 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 cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.00 tons per year from K001(48 tons per year from coatings and 7.9 tons per year from cleanup, touch-up and support material facility wide)
HAP	4.4 tons per year of any individual HAP (facility wide)
HAPs	11.5 tons per year of total HAPS, in aggregate (facility wide)

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - UV Line Number 3 composed of 15 stations (See Section A.I.2.a) for coating and drying, using air assisted and airless methods of coating application, vented into the building (for wood coating) Plant 2	OAC rule 3745-31-05(A)(3)	27.4 pounds Volatile Organic Compound (VOC) per day, including cleanup and 5.0 tons VOC per year from all coatings, including stains, toners, glazes, topcoats, spatter, wash and sealers. See Section A.2.g.
	OAC rule 3745-31-05(C)	See Section A.2.d.
	OAC rule 3745-21-07(G)(1)	Exempt (See Section A.2.b.)
	OAC rule 3745-21-07(G)(2)	Exempt (See Section A.2.c.)
	40 CFR Part 63 Subpart JJ-National Emissions Standards for Wood Furniture Manufacturing Operations	See Section A.2.f.
	OAC rule 3745-21-08	See Section A.2.e.
	OAC rule 3745-23-06(B)	See Section A.2.e.

2. Additional Terms and Conditions

2.a UV line number 3 includes the following coating and drying stations:

- | | |
|------------|--|
| Station #2 | Sorbini coater booth with two interchangeable double head roll coaters |
| Station #3 | Infrared/hot water radiant heat oven (gas fired burner - 1.3 mmBtu/hr) |
| Station #4 | Sorbini coater booth with two interchangeable single head roll coaters |

Station #5	Sorbini two interchangeable double head roll coaters
Station #7	Infrared/hot water radiant heat oven (gas fired burner - 1.3 mmBtu/hr)
Station #9	Sorbini booth with single head roll coater
Station #10	Ultraviolet oven
Station # 11	Sorbini booth with single head roll coater
Station #12	Ultraviolet oven
Station # 13	Sorbini booth with single head roll coater
Station # 14	Ultraviolet oven
Station #17	Sorbini Spatter spray booth
Station #18	Infrared oven
Station #19	Sorbini booth with double head roll coater
Station #20	Ultraviolet oven

2.b The permittee shall not employ or cleanup with photochemically reactive materials in this coating line.

2.c The permittee shall not allow coatings containing any liquid organic material or substance containing liquid organic material to come into contact with a flame or be baked, heat-cured, or heat-polymerized, in the presence of oxygen for K001.

2.d Emissions from all units located at this facility that includes R001 through R009, K001, and all non-trivial emissions units shall not exceed the following limits and restrictions:

- i. 48.0 tons VOC per rolling 12-month period, and for the first 12 months following the effective date of this permit;
- ii. 4.4 tons per rolling 12-month period of any individual HAP, and for the first 12 months following the effective date of this permit;
- iii. 11.5 tons per rolling 12-month period of total aggregate HAPs. and for the first 12 months following the effective date of this permit;
- iv. 1,367 pounds of VOC per month and 7.9 tons per year per rolling 12-month period from all cleanup, touch up and support material usage;

The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months after issuance of this permit.

2.e The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the state regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio State

Implementation Plan (SIP). When the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" will no longer exist as part of the federally-approved SIP for Ohio, and this term and condition will no longer be applicable to this emissions unit.

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B), by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

2.f This facility is not an "affected source" subject to the requirements of 40 CFR, Part 63 Subpart JJ because it is not a "major source" as defined in 40 CFR Part 63.2, for individual or aggregate hazardous air pollutants (HAPs). The permittee shall not exceed the HAP limitations contained in this permit, without obtaining a permit modification, which would contain requirements from this subpart and OAC rule 3745-77 for major source status.

2.g The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C)

B. Operational Restrictions

1. The maximum annual emissions from cleanup, touch-up and support materials from all the emissions units located at this facility shall not exceed 7.9 tons of VOC per rolling 12-month period.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

2. The weight of volatile organic compounds applied/used for R001 through R009, K001, and all non-trivial emissions units shall not exceed 48.0 tons of per rolling 12 months, calculated using the following formula:

$$48.0 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating, cleanup, touch-up and support material i in gallons for the last 12 months

VOC_i = volatile Organic compound content of coating i , cleanup i , touch-up and support material i in pounds VOC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit, K001:
 - a. the company identification for each coating, employed;
 - b. the company identification for each cleanup, touchup and support material, employed;
 - c. a determination as to whether the coating and cleanup material is photochemically reactive;
 - d. the number of gallons of each coating, employed;
 - e. the number of gallons of each cleanup, touchup and support material, employed;
 - f. the total VOC emissions from each coating, employed;
 - g. the total VOC emissions from each cleanup, touchup and support material, employed; and
 - h. the sum of all VOC emissions from all coatings, cleanup, touchup and support material, employed, in pounds per day.

2. The permittee shall collect and record the following information at the end of each month for K001, R001, R002, R003, R004, R005, R006, R007, R008, R009, and all non-trivial emissions units:
 - a. the company identification for each coating, cleanup, touchup and support material employed at each emissions unit;
 - b. the number of gallons of each coating employed, at each emissions unit;
 - c. the number of gallons of each cleanup, touch-up and support material employed at all emissions unit;
 - d. the VOC content of coating material, employed;
 - e. the VOC content of each cleanup, touch-up and support material employed;
 - f. each individual HAP (from Section 112(b), list of hazardous air pollutants, 1990 Clean Air Act, Title III) content of each coating, cleanup, touchup and support material, in pounds per gallon or percent by weight;

- g. the total VOC emissions from each cleanup, touch-up and support material, employed (number of gallons x VOC content, (C.2.c. x C.2.e) for each emissions unit;
- h. the total VOC emissions from each coating, employed (number of gallons x VOC content, (C.2.b. x C.2.d) for each emissions unit;
- i. the emissions of each individual HAP from all coating, cleanup, touch-up and support materials applied (C.2.f x C.2.b + C.2.f. x C.2.c, for each material);
- j. the total emissions of all HAPs collectively or aggregate HAPs from all coatings, cleanup, touch-up and support materials applied (sum of i for all coatings, cleanup, touch-up and support materials applied);
- k. the total VOC emissions from all coatings, cleanup, touch-up and support materials applied, for the month of record (monthly summation of C.1.f) for K001;
- l. the total VOC emissions from all coatings, cleanup, touchup and support materials applied, for the month of record (monthly summation of C.2.g + the summation of C.2.h.) for all emissions units;
- m. following the first 12-month after the effective date of this permit, the rolling 12-month summation, of all VOCs from coatings and from solvent and support materials, the rolling 12- month summation of each individual HAP, and the rolling 12-month summation of all aggregate HAPs from all emissions units located at this facility; and
- n. the rolling 12-month summation, of the weight of volatile organic compounds applied/used from coatings and from solvent and support materials as calculated per B.2.

A listing of the HAPs can also be obtained by contacting the Northeast District Office of the Ohio EPA. Material Safety Data Sheets typically include a listing of the solvents contained in coating, cleanup, touch-up and support materials. This information does not have to be kept on a line-by-line basis. [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, specifically the exhaust from the thermal oxidizers, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following table summarizes the results of the modeling from this emissions unit:

Compound	TLV (ug/m ³)	MAGLC = TLV/42 (ug/m ³)	Emission rate (g/s)	Predicted 1-hr max ground level conc. (ug/m ³)	MAGLC exceeded (Y/N)
acetone	1,187,116	28,264	0.0018	226	N
Isopropyl Alcohol	490,980	11,690	0.11	18.84	N

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used 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(AAA)(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 (AAA)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change(s).

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfied 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

All quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31, and January 31, and shall cover the records of the previous calendar quarter.

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the total VOC emissions from this emissions unit exceeded 27.4 pounds per day, and the actual VOC emissions for each such day. If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month when the total VOC emissions from cleanup, touch-up, and support materials exceeds 1367 pounds per month and 7.9 tons per rolling 12-month summation, facility-wide. If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
3. The permittee shall submit quarterly deviation reports that identify any month during which the rolling 12-month VOCs, individual HAPs, or total aggregate HAP emissions from the entire facility, exceeded the rolling 12-month limits of 48.0 tons, 4.4 tons, and 11.5 tons respectively.
4. The permittee shall submit deviation (excursion) reports that include an identification of each day during which photochemically reactive materials were employed, and the actual organic compound emissions for each such day.
5. The permittee shall submit an annual report for the previous calendar year that specifies the following:
 - a. the total VOC emissions from all the emissions units located at this facility;
 - b. the total individual HAP emissions from all emissions units located at this facility;
 - c. the total aggregate HAPs emissions from all emissions units located at this facility.

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

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Kraftmaid Cabinetry Inc
PTI Application: 02-19306
Issued: 10/7/2004

Facility ID: 0228000213
Emissions Unit ID: K001

E. Testing Requirements

1. Emission Limitation

27.4 lbs VOC/day and 5.00 tons per year from emissions unit K001

Applicable Compliance Method

OAC rule 3745-21-10(B); Compliance shall be determined based on the record keeping contained in Sections C.1.f and C.2.k of these terms and conditions.

U.S. EPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all coatings and HAPs. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the cleanup, touch-up and support materials.

2. Emission Limitation

48.0 tons VOC per rolling 12 months from all the emissions units located at this facility including mixing, coating, cleanup, touch-up, and support operations.

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of these terms and conditions.

3. Emission Limitation

1367 pounds of VOC per month and 7.9 tons per year from cleanup, touch-up and support materials, facility wide

Applicable Compliance Method

OAC rule 3745-21-10(B); Compliance shall be based on the record keeping contained in Sections C.1 and C.2 of these terms and conditions.

U.S. EPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all coatings and HAPs. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate

compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the cleanup, touch-up and support materials.

4. Emission Limitation

4.4 tons per rolling 12-month period of any individual HAP, and for the first 12 months following the effective date of this permit, from all emissions units located at this facility including the UV3 coating line (K001);

11.5 tons per rolling 12-month period of total aggregate HAPs. and for the first 12 months following the effective date of this permit, from all emissions units located at this facility, including UV3 coating line (K001).

Applicable Compliance Method

OAC rule 3745-21-10(B); Compliance shall be based on the record keeping contained in Section C.2 of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coating and cleanup materials.

F. Miscellaneous Requirements

None