

### **A. Operational Restrictions**

1. The maximum annual operating hours for emissions unit K004 shall not exceed 2000 hours per year.

### **B. Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for emissions unit K004:

- (a) The name and identification number of each coating employed.
- (b) The volume, in gallons, of each coating employed.
- (c) The total volume, in gallons, of all of the coatings employed.
- (d) The total number of hours of operation.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

- (a) The name and identification of each cleanup material employed.
- (b) The number of gallons of each cleanup material employed.
- (c) The VOC content of each cleanup material, in pounds per gallon.
- (d) The VOC content of each coating, as applied, in pounds per gallon.
- (e) The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

### **C. Reporting Requirements**

1. The permittee shall notify the Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance.

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

#### **D. Records Retention Requirements**

1. 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.

#### **E. Compliance determination**

Emission limitations: 10 gallons of coating per day, 4.5 lbs VOC/hr and 4.5 Tons VOC/yr

Compliance Methodology: Record keeping requirements of section B of these terms and conditions shall be used to determine compliance with the above referenced emission limits.

EPA Method 24 shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

#### **F. Air Toxics**

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

Pollutant:Toluene

TLV (ug/m3):188,000  
Maximum Hourly Emission Rate (lbs/hr):4.5  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):4476

Pollutant:Ethylbenzene

TLV (ug/m3):434,000  
Maximum Hourly Emission Rate (lbs/hr):4.5  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):10,333

Pollutant:xylene

TLV (ug/m3):434,000  
Maximum Hourly Emission Rate (lbs/hr):4.5  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):10,333

Pollutant:Trimethylbenzene

TLV (ug/m3):123,000  
Maximum Hourly Emission Rate (lbs/hr):4.5  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):2928

Pollutant:N butly acetate

TLV (ug/m3):713,000  
Maximum Hourly Emission Rate (lbs/hr):4.5  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):16,976

Pollutant:Mineral Spirits

TLV (ug/m3):525,000  
Maximum Hourly Emission Rate (lbs/hr):4.5  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):12,500

**Pollutant:V , M and P Naptha**

**TLV (ug/m3):1,370,000**

**Maximum Hourly Emission Rate (lbs/hr):4.5**

**Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3):2730**

**Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3):32,619**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Central District Office are required, including the possible issuance of modifications to this PTI and the operating permit:

- (a) Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.
- (b) Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- (c) Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- (d) Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
- (e) Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

