



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
PUTNAM COUNTY
Application No: 03-16130
Fac ID: 0369000021**

DATE: 8/24/2004

W.C. Wood Company, Inc.
Glenn Kaufman
PO Box 310 677 Woodland Drive
Ottawa, OH 45875

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR Part 60, Subpart SS	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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

NWDO



Permit To Install
Terms and Conditions

Issue Date: 8/24/2004
Effective Date: 8/24/2004

FINAL PERMIT TO INSTALL 03-16130

Application Number: 03-16130
Facility ID: 0369000021
Permit Fee: **\$100**
Name of Facility: W.C. Wood Company, Inc.
Person to Contact: Glenn Kaufman
Address: PO Box 310 677 Woodland Drive
Ottawa, OH 45875

Location of proposed air contaminant source(s) [emissions unit(s)]:
**677 Woodland Drive
Ottawa, Ohio**

Description of proposed emissions unit(s):
Electro deposition paint dip coating line large appliance (Freezer Parts) with repair booth (Modification to PTIs 03-7778 and 03-8443 to allow for change in permit allowables.

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>
OC	26.24
Individual HAP	9.88

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>
Large appliance coating line involving Electro deposition paint system and touch up booth. (Modification to PTI 03-7778 issued on March 23, 1994 and PTI 03-8443 issued on May 10, 1995) Modification combines coating repair operations (previously permitted as K003) as part of K004 and also establishes new permit allowables including a synthetic minor restriction on single HAPs	OAC rule 3745-31-05 (A) (3)	5.89 lbs organic compounds (OC)/hr & 25.80 tons OC/yr from coating/touch up operations
		72.5 lbs OC/month and 0.44 ton OC/yr from cleanup operations
		See A.2.a.
	OAC rule 3745-31-05 (C)	9.88 tons per rolling, 12-month period for any individual HAP (See A.2.d)
	OAC rule 3745-21-09 (K)(1)	2.8 lbs volatile organic compound (VOC)/gallon of coating/lacquer excluding water and exempt solvents (daily volume-weighted average) See A.2.b.
	OAC rule 3745-21-09 (K)(2)	See A.2.c.
	40 CFR Part 60, Subpart SS	0.90 kilogram VOC per liter of applied coating/lacquer solids (7.53 lbs VOC per gallon of applied coating/lacquer solids) (monthly volume-weighted average)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C), OAC rule 3745-21-09 (K), and 40 CFR Part 60, Subpart SS.

- 2.b** The permittee may not cause, allow or permit the discharge into the ambient air of any volatile organic compounds (VOC) in excess of 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents from the large appliance coating line based on a daily volume-weighted average of the coatings employed in the Electro deposition paint system and lacquers applied in the touch booth.
- 2.c** On any day when only quick drying lacquers are employed (i.e. the Electro deposition paint system is not operational), in order for the emission limitation of 2.8 lbs VOC/gallon of coating excluding water and exempt solvents not to apply [as provided by OAC rule 3745-21-09(K)(2)], the maximum usage of such lacquers shall not exceed one quart in any eight-hour period.
- 2.d** Annual HAP emissions resulting from the use of coatings in this emissions unit shall not exceed 9.88 tons per rolling 12-month period for any individual HAP. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>
1-1	2.00
1-2	2.73
1-3	3.46
1-4	4.19
1-5	4.92
1-6	5.65
1-7	6.38
1-8	7.11
1-9	7.84
1-10	8.57
1-11	9.30
1-12	9.88

After the first 12-calendar months of operation following the issuance of this permit, compliance with the annual HAP limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for month for the large appliance coating line (Electro deposition paint system and touch up booth):

- a. The name and identification of each coating and lacquer employed;
- b. The OC content of each coating and lacquer, in lbs/gal, as applied;
- c. The number of gallons of each coating and lacquer employed;
- d. The OC emission rate for each coating and lacquer employed, ("b" x "c"), in lbs/month;
- e. The total OC emissions rate for all coatings and lacquers employed, summation of ("d"), in lbs/month; and
- f. The annual, year to date OC emissions, in tons, from all coatings and lacquers employed (sum of "h") for each calendar day to date from January to December).

2. On any day when the Electro deposition paint system is operational, the permittee shall collect and record the following for the large appliance coating line for such day:

- a. The name and identification of each coating and lacquer employed;
- b. The number of gallons (excluding water and exempt solvents) of each coating and lacquer applied [the number of gallons excluding water and exempt solvents shall be calculated by the following equation:

$$\text{number of gallons (excluding water and exempt solvents)} = L_c (V_s + V_{vm} - V_w - V_{es})$$

where:

L_c = liquid volume of each coating/lacquer employed, in gallons

V_s = volume fraction of solids (nonvolatile matter) in coating/lacquer, in gallon of solids per gallon of coating.

V_{vm} = volume fraction of volatile matter in coating/lacquer, in gallon of volatile matter per gallon of coating.

V_w = volume fraction of water in coating/lacquer, in gallon of water per gallon of coating.

V_{es} = volume fraction of exempt solvent in coating/lacquer, in gallon of exempt solvent per gallon of coating.

- c. The VOC content of each coating and lacquer (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. The daily volume-weighted average VOC content of all coatings and lacquers, as applied, calculated in accordance with the equation specified in paragraph (B) (9) of OAC rule 3745-21-10 for $C_{VOC,2}$;
3. On any day when only quick drying lacquers are employed (i.e. the Electro deposition paint system is not operational) the permittee shall collect and record the combined usage of such lacquers in quarts (or liquid ounces) for each eight-hour period.
 4. The permittee shall collect and record the following information each month for cleanup material usage for the large appliance coating line (Electro deposition paint system and touch up booth):
 - a. The company identification of each cleanup material employed;
 - b. The number of gallons of each cleanup material employed;
 - c. The organic compound content, in pounds per gallon, for each cleanup material employed;
 - d. The organic compound emission rate for each cleanup material employed, in lbs/month ("b" x "c");

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

- e. The total organic compound emission rate for all cleanup materials employed (sum of "d"); and

- f. The annual, year to date organic compound emissions, in tons, from all cleanup materials employed (sum of "e") for each calendar month to date from January to December.
5. The permittee shall collect and record the following information for each month for the large appliance coating line (Electro deposition paint system dip and touch up booth):
- a. The name and identification of each coating and lacquer, as applied;
- b. The monthly volume-weighted average mass of VOC's emitted to the atmosphere per volume of applied coating/lacquer solids calculated in accordance with the following equations:
- (i) Calculate the mass of VOC's consumed ($M_o + M_d$) during the calendar month by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

Where: $\sum L_{dj} D_{dj}$ will be 0 if no VOC-solvent is added

$M_o + M_d$ = the mass of VOC's consumed

n = the number of different coatings used during the calendar month

m = the number of different VOC-solvents added to coatings during a calendar month

L_c = the volume of coating consumed as received (liters)

D_c = density of coating/lacquer (or input stream), as received (kilograms/liter)

W_o = the proportion of VOC's in a coating/lacquer (or input stream), as received (fraction by weight).

L_d = the volume of VOC-solvent added to coatings/lacquer (liters)

D_d = density of a VOC-solvent added to coatings/lacquers (kilograms per liter)

- (ii) Calculate the total volume of coating/lacquer solids used (L_s) in the calendar month by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

Where: n = the number of different coatings/lacquers used during the calendar month

L_s = total volume of coating/lacquer solids used

L_c = the volume of coating/lacquer consumed as received (liters)

V_s = the proportion of solids in a coating/lacquer (or input stream), as received (fraction by volume)

- (iii) Select the appropriate transfer efficiency from Table 1 of 40 CFR part 60.453. If the owner or operator can demonstrate to the satisfaction of the Director that transfer efficiencies other than those shown in Table 1 are appropriate, the Director will approve their use on a case-by-case basis. Transfer efficiencies for application methods not listed shall be determined by the Director on a case-by case basis. An owner or operator must submit sufficient data for the Director to judge the accuracy of the transfer efficiency claims.

Where more than one application method is used within a single surface coating operation (i.e. Electro deposition paint system dip and touch up booth), the owner or operator shall determine the composition and volume of each coating/lacquer applied by each method through means acceptable to the Director and compute the weighted average transfer efficiency by the following equation:

$$T = \frac{\sum_{i=1}^n \sum_{k=1}^m L_{cik} V_{sik} T_k}{L_s}$$

Where: n = the number of coatings/lacquers (or input streams) used

m = the number of application methods used

L_c = the volume of coating/lacquer consumed as received (liters)

V_s = the proportion of solids in a coating (or input stream), as received (fraction by volume)

T = the transfer efficiency (fraction)

- (iv) Calculate the volume-weighted average mass of VOC's consumed per unit volume of coating/lacquer solids applied (G) during the calendar month by the following equation:

$$G = \frac{M_o + M_d}{L_s T}$$

Where: G = the volume-weighted average mass of VOC's consumed per unit volume of coating/lacquer solids applied

$M_o + M_d$ = mass of VOC's consumed during a calendar month

L_s = the total volume of coating/lacquer solids used

T = the transfer efficiency (fraction)

- (v) Calculate the volume-weighted average VOC emissions to the atmosphere (N) during the calendar month by the following equation:

$$N = G$$

Where: N = volume weighted average VOC emissions to the atmosphere

G = the volume-weighted average mass of VOC'S consumed per unit volume of coating/lacquer solids applied

Note: All symbols not defined above are given meaning in 40 CFR Part 60, Subpart A.

- 6.** The permittee shall collect and record the following information regarding HAPs emissions each month for the large appliance coating line (Electro deposition paint system dip and touch up booth):
- a. The company identification of each coating/lacquer employed;
 - b. The lbs per gallon of each HAP in each coating/lacquer, as applied;
 - c. The number of gallons of each coating/lacquer employed;
 - d. The emission rate for each HAP from each coating/lacquer employed, ("b" x "c") for each HAP in lbs/month;
 - e. The total emission rate for each HAP from all coatings/lacquers employed, summation of ("d") for each HAP in lbs/month;

- f. For the first 12 months of operation, the cumulative monthly emission rate of each individual HAP, in tons per month; and
 - g. After the first 12 months of operation, the annual emissions of each HAP, based upon a rolling 12-month summation.
7. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-butoxyethanol

TLV (mg/m³): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.59

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 511

MAGLC (ug/m³): 2880

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the compositions 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 evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- 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 identify, record, and submit a written report to the Director every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted into the atmosphere per volume of applied coating/lacquer solids is greater than 0.90 kilogram per liter. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Director semiannually. Each quarterly report shall be submitted by January 31, April 30, July 31, and October 31 of each year and each semiannual report shall be submitted by January 31 and July 31 of each year.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month. The following are usages of noncomplying coatings/lacquers that are to be reported:
 - a. Any daily volume-weighted average VOC content exceeding the 2.8 lbs volatile organic compound (VOC)/gallon of coating/lacquer excluding water and exempt solvents.
 - b. Any day when only quick drying lacquers were employed (i.e. the Electro deposition paint system is not operational) the and the combined usage of such lacquers exceeded 1 quart during any 8 - hour period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission levels specified in section A.2.d.
4. The permittee shall submit annual deviation (excursion) reports which identify all exceedances of the following:
 - a. 25.80 tons OC/yr from coating/touch up operations
 - b. 0.44 ton OC/yr from cleanup operations

If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
5.89 lbs OC/hr from coating/touch up operations

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on maximum gallon usages and OC contents of 5.28 gal/hr resin @ 0.92 lb OC/gal, 1.31 gal/hr paste @ 0.56 lb/gal, and 0.06 gal/hr lacquer @ 5.07 lbs/gal.

- b. **Emission Limitation**
25.80 tons OC/yr from coating/touch up operations

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in C.1. of this permit.

c. **Emission Limitation**

72.5 lbs OC/month & 0.44 ton OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in C.4. of this permit.

d. **Emission Limitation**

9.88 tons per rolling 12-month period for any individual HAP

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in C.6. of this permit.

e. **Emission Limitation**

2.8 lbs VOC/gal of coating/lacquer excluding water and exempt solvents (daily volume-weighted average)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in C.2. of this permit. Method 24 of 40 CFR 60, Appendix A, or formulation data supplied by the coating manufacturer, shall be used to determine the VOC content of a coating. In the event of dispute, Method 24 shall be the reference method. For determining compliance only, results of Method 24 analyses of waterborne coatings shall be adjusted as described in Section 12.6 of Method 24.

f. **Emission Limitation**

On any day when the Electro deposition paint dip coating line is not operational, quick drying lacquers employed in the repair booth for the repair of scratches and nicks that occur during assembly, shall not exceed a maximum usage of one quart in any eight-hour period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in C.3. of this permit.

g. **Emission Limitation**

0.90 kilogram VOC per liter of applied coating solids, 7.53 lbs VOC per gallon of applied coating solids (monthly volume-weighted average)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in C.5. of this permit. Method 24 of 40 CFR 60, Appendix A, or formulation data supplied by the coating manufacturer, shall be used to determine the VOC content of a coating. In the event of

dispute, Method 24 shall be the reference method. For determining compliance only, results of Method 24 analyses of waterborne coatings shall be adjusted as described in Section 12.6 of Method 24.

F. Miscellaneous Requirements

None