AIR EMISSION SUMMARY

The air contaminant source(s) listed below comprise the Permit to Install for Universal Coach Parts, Inc. located in Ashland County. The source(s) listed below shall not exceed the emission limits/control requirements contained in the table below. This condition in no way limits applicability of any other state or federal regulations. Additionally, this condition does not limit the applicablity of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions or Control & Usage Requirements
L002	50 gallon Isopropyl Alcohol cold cleaner	Compliance with the terms and conditions of this permit and Ohio EPA Air Toxics Policy.	3745-31-05	50.4 lbs VOC/day 9.2 TPY
			3745-21-09(O)(2)	Control requirements (See AST&C's)
K002	Primer spray and dip spray station.	Compliance with the terms and conditions of this permit and Ohio EPA Air Toxics Policy.	3745-31-05	41.0 lbs VOC/day 7.5 TPY. 0.03 lbs PE/hr 0.13 TPY 0% opacity as a six-minute average.
			3745-21-09 (U)(2)(e)	10 or less gallons of coatings a day.
			3745-17-07	*
			3745-17-11	*

*The emission limitation restriction established by this rule is less stringent than the limit established by OAC 3745-31-05.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSION

Pollutant	Tons/Year
VOC	16.7
PE	0.13

Universal Coach Parts, Inc.
Application No. 03-10783

Additional Special Terms and Conditions

INTRODUCTION:

Permit to Install (PTI 03-10783)Universal Coach Parts, Inc. paints misc. metal parts and has the potential to emit more than 100 TPY for VOC and HAPs over 10 and 25 TPY. They applied for a FESOP for all existing emissions units. PTI 03-10783 is for an isopropyl alcohol cold cleaner and a primer spay booth for brake shoe painting. These two emissions units PTE do not trigger any Title V thresholds, so their allowable will be their PTE. The emission restrictions will be dealt with as group limits in the FESOP.

I. EMISSION LIMITATIONS and/or Control Requirements:

No additional emissions limitations and/or control requirements. (See Air Summary for applicable emissions limitations and/or control requirements.)

II.Operational Restrictions:

2. Emissions unit L002 shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

    a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

    b. Store waste solvent in covered containers.

    c. Close the cover whenever parts are not being handled in the cleaner.

    d. Drain the cleaned parts until dripping ceases.

    e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

    f. Clean only materials that are neither porous nor absorbent.

3. Emissions unit L002 shall be quipped with a device for draining the cleaned parts; and the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage

device cannot fit into the cleaning system.

4. The permittee shall use a dry filtration system in emissions unit K002 whenever the emissions unit is in operation.

Emissions unit K002 and L002 allows for the use of the coatings, cleanup materials, and degreasing materials specified by the permittee in PTI number 03-10783. In Conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the coatings, cleanup materials, and degreasing materials formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 2 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

POLLUTANT	TLV (ug/m3)	MAXIMUM HOURLY EMISSION RATE (lbs/hr)	PREDICTED 1 HOUR MAXIMUM GROUND-LEVEL CONCENTRATION AT THE FENCELINE (ug/m3)	MAXIMUM ACCEPTABLE GROUND LEVEL CONCENTRATION (MAGLC) (ug/m3)
L002 IPA	983,000	1.32	5,371	23,404
K002 MEK	590,000	1.70	5,121	14,047

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 are required:

a. Any change in the composition of the coating 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, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01 (B)(6)].

III. MONITORING/RECORD KEEPING REQUIREMENTS:

1. The permittee shall collect the following information each day for emissions unit L002:

a. The types of solvents employed in the cold cleaner.

b. The vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit.

c. The number of gallons, excluding water and exempt solvents, of each cleaning solvent used.

d. The volatile organic compound emission rate for each solvent in pounds/day.

e. The annual year to date VOC emissions from all solvents material usage [sum of d.]

2. The permittee shall collect the following information each day for emissions unit K002:

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

b. The VOC content of each coating, excluding water and exempt solvents, on an as applied basis.

c. The number of gallons, excluding water and exempt solvents, of each coating employed.

d. The total VOC emissions from all coatings employed, in pounds per day. [(b)x(c)]

e. The total VOC emissions from all coatings employed, in tons per year. (The sum of d).

f. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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, if a strip-chart recorder is employed, for continuous monitoring

instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

IV. REPORTING REQUIREMENTS:

1. The permittee shall notify the Director (the appropriate District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office) within 30 days after the event occurs.

2. Quarterly written reports of any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by testing, monitoring and record keeping requirements specified in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken, shall be promptly made to the Ohio EPA, Northwest District Office, Division of Air Pollution Control. these quarterly reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) and pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06.

3. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

4. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, October 31 of each year and shall cover the previous calendar quarters.

5. The actual annual VOC emissions data for emissions units L002, and K002 shall be reported pursuant to the fee emissions report required by OAC 3745-78-02(A).

V. Testing requirements

L002

Compliance Methods Requirements:

1. Emission Limitations L001-
50.4 lbs VOC/day and 9.2 TPY

1.a Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements in sections III (1)(e) and III (1)(f).

K002

2. Emission Limitations K002-
41 lbs VOC/day (10 or less gallons/day) and 7.5 TPY.

2.b Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements in sections III (2)(c),(d), and (e).

2.c Emission Limitation-
0.03 lbs PE/hr, 0.10 TPY*

2.d Applicable Compliance Method:
Compliance shall be determined using test procedures specified in 40 CAR Part 60, Appendix A. In absence of requiring such testing, compliance shall be determined by using the following formula:

E=(maximum coating solids usage rate in pounds per hour)*(1-TO)*(1-CE)

E = Particulate emissions rate (lbs/hr)

TO = Transfer efficiency, which is the ratio of the amount coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment

*tons PE/yr should be determined using the above calculated PE emissions (lbs/hr) and the actual operating hours for the emissions unit.

2.e Emission Limitation-
0% opacity limitation

2.d Applicable Compliance Method:
Compliance with the visible emissions limitations shall be determined in accordance with the test method 40 CFR 60, Appendix A-Method 9.

VI. Miscellaneous Requirements:

NONE