



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

06/29/01

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

06-71-01-0121  
Kenworth Truck Company  
Kenneth G Legner  
65 Kenworth Drive  
Chillicothe, OH 45601

Dear Kenneth G Legner:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Southeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Southeast District Office.**

Very truly yours,

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

cc: USEPA (electronically submitted)  
Michael Ahern, DAPC PMU  
Southeast District Office  
Kentucky



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/29/01

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 06-71-01-0121 to:
Kenworth Truck Company
65 Kenworth Drive
Chillicothe, OH 45601

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include K001 (Frame Assembly), K002 (R&D Booth), K003 (Touch Up Booth #1), K004 (Touch Up Booth #2), K005 (Cab Booth #1), K006 (Cab Booth #2), K007 (Cab Booth #3), K016 (Cab Booth #4), K017 (Touch Up Booth #3), K018 (Touch Up Booth #4), K019 (Cab Touch Up TKS), K020 (Fiberglass), and R010 (Undercoating Booth).

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) 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 the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.8 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## 6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 7. 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.

## 8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

## 9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

## 10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## 11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## 12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

#### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

#### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

#### **16. Off Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

#### **17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

#### **18. Insignificant Activity**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

## **B. State Only Enforceable Section**

### **1. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **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. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforcable Section

None

### B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 - plant roadways and parking areas;  
Z002 - west generator;  
Z003 - east generator;  
Z004 - solvent reclamation system;  
Z005 - cab washer;  
Z006 - maintenance parts washer;  
Z007 - maintenance welding/cutting;  
Z008 - paint mixing in Dupont room;  
Z009 - maintenance welder;  
Z010 - tool crib welding station;  
Z011 - tool crib parts washer;  
Z012 - diesel fuel back-up generator;  
Z013 - back-up pump;  
Z014 - mobile cutting torch;  
Z015 - cutting torches (2 frame rail stationary torches);  
Z016 - axle weld;  
Z017 - cardboard bailers around plant;  
Z018 - trash compactor;  
Z019 - natural gas heater less than 10 mmBtu/hr;  
Z020 - natural gas heater less than 10 mmBtu/hr;  
Z021 - natural gas heater less than 10 mmBtu/hr;  
Z022 - natural gas heater less than 10 mmBtu/hr;  
Z023 - natural gas heater less than 10 mmBtu/hr;  
Z024 - natural gas heater less than 10 mmBtu/hr;  
Z025 - natural gas heater less than 10 mmBtu/hr;  
Z026 - natural gas heater less than 10 mmBtu/hr;  
Z027 - natural gas heater less than 10 mmBtu/hr;  
Z028 - natural gas heater less than 10 mmBtu/hr;  
Z029 - vehicle testing department;  
Z030 - dynamometer #1;  
Z031 - dynamometer #2;  
Z032 - facility wide maintenance painting; and  
Z033 - frame rail enclosed cutting area torch.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Frame Assembly (K001)  
**Activity Description:** Paint chassis for trucks

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
frame assembly controlled with a water wash system	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	<p>Volatile organic compound (VOC) emissions shall not exceed 200.0 lbs/hr and 174.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.</p> <p>Particulate emissions shall not exceed 11.3 tpy.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).</p>
	OAC rule 3745-17-07(A)	<p>See A.I.2.a below.</p> <p>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11(B)	<p>Particulate emissions shall not exceed 2.58 lbs/hr.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.II.2 below.</p>
	OAC rule 3745-21-09(U)(1)(c)	<p>The VOC contents of the coatings employed shall not exceed the following:</p> <p>3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)</p>

## **2. Additional Terms and Conditions**

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## **II. Operational Restrictions**

1. The permittee shall operate the water wash system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## **III. Monitoring and/or Record Keeping Requirements**

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month, i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 200.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 174.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the water wash system was not in service.
4. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
  - 1.b Emission Limitation:

200.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.
  - 1.c Emission Limitation:

174.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

## V. Testing Requirements (continued)

### 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

### 1.e Emission Limitation:

2.58 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 244.4 lbs/hr of solids by the control efficiency of (1 - 0.99). This emission factor was established from company data to determine an emission rate for particulates from spray booths at this facility. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

11.3 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

### 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** R&D Booth (K002)  
**Activity Description:** Test paints, paint some small parts

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R&D booth controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	<p>Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.</p> <p>Particulate emissions shall not exceed 2.41 tpy.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).</p>
	OAC rule 3745-17-07(A)	<p>See A.I.2.a below.</p> <p>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11(B)	<p>Particulate emissions shall not exceed 0.551 lb/hr.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.II.2 below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

**2. Additional Terms and Conditions**

- 2.a The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

**II. Operational Restrictions**

- 1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
- 2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

**III. Monitoring and/or Record Keeping Requirements**

- 1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Touch Up Booth #1 (K003)  
**Activity Description:** Touch up paint on trucks

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
touch up booth #1 controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.  Particulate emissions shall not exceed 2.41 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07(A)	See A.I.2.a below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

## 2. Additional Terms and Conditions

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Touch Up Booth #2 (K004)  
**Activity Description:** Touch up paint on trucks

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
touch up booth #2 controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.  Particulate emissions shall not exceed 2.41 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07(A)	See A.I.2.a below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

## 2. Additional Terms and Conditions

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Cab Booth #1 (K005)  
**Activity Description:** Paint truck cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
cab booth #1 controlled with a water wash system	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 200.0 lbs/hr and 80.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.
		Particulate emissions shall not exceed 11.3 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.58 lbs/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.
	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the coatings employed shall not exceed the following:
		3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

## **2. Additional Terms and Conditions**

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## **II. Operational Restrictions**

1. The permittee shall operate the water wash system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## **III. Monitoring and/or Record Keeping Requirements**

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month, i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 200.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 80.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the water wash system was not in service.
4. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
  - 1.b Emission Limitation:

200.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.
  - 1.c Emission Limitation:

80.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

## V. Testing Requirements (continued)

### 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

### 1.e Emission Limitation:

2.58 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 244.4 lbs/hr of solids by the control efficiency of (1 - 0.99). This emission factor was established from company data to determine an emission rate for particulates from spray booths at this facility. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

11.3 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

### 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Cab Booth #2 (K006)  
**Activity Description:** Paint truck cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
cab booth #2 controlled with a water wash system	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 200.0 lbs/hr and 80.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.
		Particulate emissions shall not exceed 11.3 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.58 lbs/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.
	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the coatings employed shall not exceed the following:
		3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

## 2. Additional Terms and Conditions

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall operate the water wash system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month, i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 200.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 80.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the water wash system was not in service.
4. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
  - 1.b Emission Limitation:

200.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.
  - 1.c Emission Limitation:

80.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

## V. Testing Requirements (continued)

### 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

### 1.e Emission Limitation:

2.58 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 244.4 lbs/hr of solids by the control efficiency of (1 - 0.99). This emission factor was established from company data to determine an emission rate for particulates from spray booths at this facility. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

11.3 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

### 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Cab Booth #3 (K007)  
**Activity Description:** Paint truck cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
cab booth #3 controlled with a water wash system	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 200.0 lbs/hr and 80.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.
		Particulate emissions shall not exceed 11.3 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.58 lbs/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.
	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the coatings employed shall not exceed the following:
		3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

## **2. Additional Terms and Conditions**

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## **II. Operational Restrictions**

1. The permittee shall operate the water wash system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## **III. Monitoring and/or Record Keeping Requirements**

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month, i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 200.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 80.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the water wash system was not in service.
4. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
  - 1.b Emission Limitation:  
  
200.0 lbs/hr of VOC  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.
  - 1.c Emission Limitation:  
  
80.0 tpy of VOC, based on a rolling, 12-month summation  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

## V. Testing Requirements (continued)

### 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

### 1.e Emission Limitation:

2.58 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 244.4 lbs/hr of solids by the control efficiency of (1 - 0.99). This emission factor was established from company data to determine an emission rate for particulates from spray booths at this facility. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

11.3 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

### 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Cab Booth #4 (K016)  
**Activity Description:** Paint truck cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
cab booth #4 controlled with a water wash system	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	<p>Volatile organic compound (VOC) emissions shall not exceed 200.0 lbs/hr and 80.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.</p> <p>Particulate emissions shall not exceed 11.3 tpy.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).</p>
	OAC rule 3745-17-07(A)	<p>See A.I.2.a below.</p> <p>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11(B)	<p>Particulate emissions shall not exceed 2.58 lbs/hr.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.II.2 below.</p>
	OAC rule 3745-21-09(U)(1)(c)	<p>The VOC contents of the coatings employed shall not exceed the following:</p> <p>3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)</p>

## **2. Additional Terms and Conditions**

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## **II. Operational Restrictions**

1. The permittee shall operate the water wash system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## **III. Monitoring and/or Record Keeping Requirements**

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month, i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 200.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 80.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the water wash system was not in service.
4. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
  - 1.b Emission Limitation:  
  
200.0 lbs/hr of VOC  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.
  - 1.c Emission Limitation:  
  
80.0 tpy of VOC, based on a rolling, 12-month summation  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

## V. Testing Requirements (continued)

### 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

### 1.e Emission Limitation:

2.58 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 244.4 lbs/hr of solids by the control efficiency of (1 - 0.99). This emission factor was established from company data to determine an emission rate for particulates from spray booths at this facility. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

11.3 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

### 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Touch Up Booth #3 (K017)

**Activity Description:** Touch Up paint on trucks//to be installed/ESTIMATED DATES

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
touch up booth #3 controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.
		Particulate emissions shall not exceed 2.41 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

## 2. Additional Terms and Conditions

- 2.a The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Touch Up Booth #4 (K018)

**Activity Description:** Touch Up paint on trucks//to be installed/ESTIMATED DATES

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
touch up booth #4 controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.  Particulate emissions shall not exceed 2.41 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07(A)	See A.I.2.a below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

## 2. Additional Terms and Conditions

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Cab Touch Up TKS (K019)  
**Activity Description:** Touch up paint for cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
cab touch up TKS controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.
		Particulate emissions shall not exceed 2.41 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

## 2. Additional Terms and Conditions

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Fiberglass (K020)

**Activity Description:** Touch up paint for cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
fiberglass touch up controlled with an exhaust filter	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.  Particulate emissions shall not exceed 2.41 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07(A)	See A.I.2.a below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.II.2 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.</p>

## 2. Additional Terms and Conditions

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

## II. Operational Restrictions

1. The permittee shall employ the exhaust filter system for the control of particulate emissions when this emissions unit is in operation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the exhaust filter system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the filter exhaust system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Undercoating Booth (R010)  
**Activity Description:** Solvent wiping of cabs

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
undercoating booth controlled with a water wash system	OAC rule 3745-31-05(A)(3) (PTI 06-4949)	<p>Volatile organic compound (VOC) emissions shall not exceed 50.0 lbs/hr and 20.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials.</p> <p>Particulate emissions shall not exceed 2.41 tpy.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U)(1)(c).</p>
	OAC rule 3745-17-07(A)	<p>See A.I.2.a below.</p> <p>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11(B)	<p>Particulate emissions shall not exceed 0.551 lb/hr.</p>
	OAC rule 3745-21-07(G)(2)	<p>See A.II.2 below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(iii)	This emissions unit shall not employ more than 10.0 gallons of coatings on metal parts in any given day.  If this emissions unit ever employs more than 10.0 gallons of coatings on metal parts in any given day, thereafter, the VOC content of all metal parts coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

**2. Additional Terms and Conditions**

- 2.a** The coating and cleanup material usages shall be limited such that the maximum annual VOC usage for this facility (i.e., emissions units K001, K002, K003, K004, K005, K006, K007, K016, K017, K018, K019, K020, and R010) shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

**II. Operational Restrictions**

- 1. The permittee shall operate the water wash system for the control of particulate emissions when this emissions unit is in operation.
- 2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

**III. Monitoring and/or Record Keeping Requirements**

- 1. 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 (excluding water and exempt solvents) and the number of gallons of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, in pounds per gallon;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month;
  - e. the hours of operation of this emissions unit;
  - f. the average hourly VOC emission rate from all coatings and cleanup materials employed, in pounds and tons per month. i.e., (d)/(e); and
  - g. the rolling, 12-month summation of the VOC emissions from this emissions unit.
3. The permittee shall collect and record the following information each month:
  - a. the total VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month; and
  - b. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010, in tons per month.
4. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
5. For each day a photochemically reactive coating and/or clean-up material is employed, the permittee shall maintain a record of the type and quantity of photochemically reactive materials employed in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the VOC emissions from all the coatings and cleanup materials exceeded 50.0 lbs/hr, and the actual hourly average VOC emissions for each such day;
  - b. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in this emissions unit exceeded 20.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month; and
  - c. an identification of each month during which the VOC emissions from the coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010 exceeded 335.0 tpy, as a rolling, 12-month summation, and the actual VOC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all days when this emissions unit was in operation and the water wash system was not in service.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

This emissions unit shall not employ more than 10.0 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(c), and the 10.0 gallons per day limitation shall no longer be applicable.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.b Emission Limitation:

50.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. If required, compliance shall also be demonstrated based upon emission tests performed in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 25.

- 1.c Emission Limitation:

20.0 tpy of VOC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.2.

- 1.d Emission Limitation:

335.0 tpy of VOC, based upon a rolling, 12-month summation of the VOC usage for all coatings and cleanup materials employed in emissions units K001 through K007, K016 through K021, and R010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 through A.III.3.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

### 1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable emission limitation for particulate emissions by the actual hours of operation per year, and then dividing by 2000 lbs/ton.

### 1.g Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

## 2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee shall either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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