



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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

4/27/2009

Certified Mail

Heather Klesch  
Clow Water Systems Company  
P. O. Box 6001  
2266 South Sixth Street  
Coshocton, OH 43812-6001

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0616010006  
Permit Number: P0104348  
Permit Type: Initial Installation  
County: Coshocton

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA DAPC, Southeast District Office

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**FINAL**

**Air Pollution Permit-to-Install**  
for  
Clow Water Systems Company

Facility ID: 0616010006  
Permit Number: P0104348  
Permit Type: Initial Installation  
Issued: 4/27/2009  
Effective: 4/27/2009





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 Clow Water Systems Company

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
**Facility ID:** 0616010006  
**Effective Date:** 4/27/2009

## Authorization

Facility ID: 0616010006  
Facility Description: Ductile Iron Pipe and Fittings.  
Application Number(s): A0036620, A0036954  
Permit Number: P0104348  
Permit Description: Installation of new temporary zinc arc spray and topcoat/adhesive operation.  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 4/27/2009  
Effective Date: 4/27/2009

This document constitutes issuance to:

Clow Water Systems Company  
P. O. Box 6001  
2266 South Sixth Street  
Coshocton (Tuscarawas Twp, OH 43812-6001

Of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
**Facility ID:** 0616010006  
**Effective Date:** 4/27/2009

## Authorization (continued)

Permit Number: P0104348  
 Permit Description: Installation of new temporary zinc arc spray and topcoat/adhesive operation.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	Temporary Zinc Arc Spray
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K012</b>
Company Equipment ID:	Temporary Zinc Top Coat and Adhesive
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
**Facility ID:** 0616010006  
**Effective Date:** 4/27/2009

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.



- 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, 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 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.

**4. Monitoring and Related Record Keeping 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:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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, 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.
- 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



(2) 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 made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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:



- (1) 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.
  - (2) 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 ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

**7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- 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 state-only required 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 Ohio EPA DAPC, Southeast District Office. 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



(i.e., postmarked) quarterly, 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

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

## **15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
**Facility ID:** 0616010006  
**Effective Date:** 4/27/2009

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

**18. 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.

**19. 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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
**Facility ID:** 0616010006  
**Effective Date:** 4/27/2009

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104348  
**Facility ID:** 0616010006  
**Effective Date:** 4/27/2009

## **C. Emissions Unit Terms and Conditions**



**1. K011, Temporary Zinc Arc Spray**

**Operations, Property and/or Equipment Description:**

Temporary zinc arc spray operation controlled with a baghouse with a maximum zinc coating usage of 86,000 pounds; includes zinc coating preparation emissions

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	See b)(2)a. below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.  See b)(2)b. below.
c.	OAC rule 3745-17-07(B)	See b)(2)c. below.
d.	OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	PE from the stack serving this emissions unit shall not exceed 0.551 lb/hr.  See b)(2)b. below.
f.	OAC rule 3745-17-11(C)	See b)(2)d. and e. below.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate is less than 10 tons/year, taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B)(1) and/or the federally enforceable required controls under OAC rule 3745-17-11(C).

b. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate



emissions. Until the U.S. EPA approves the revision to OAC rule 3745-17-11, the requirement to comply with the previous 17-11(B)(1) and 17-07(A) rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)b. and e.

- c. This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- e. The permittee shall operate the baghouse whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a baghouse for the surface coating operation in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The baghouse shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the baghouse or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baghouse, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the baghouse to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the



manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the baghouse while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the baghouse and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain daily records that document any time periods when the baghouse was not in service when the emissions unit was in operation, as well as, a record of all operations during which the baghouse was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. any daily record showing that the baghouse was not in service (normal operation) when the emissions unit was in operation; and
  - b. any operations during which the baghouse was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee.

If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:



Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

b. Emission Limitation:

PE from the stack serving this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to USEPA Methods 1 - 5.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



**2. K012, Temporary Zinc Top Coat and Adhesive**

**Operations, Property and/or Equipment Description:**

Temporary Zinc Top Coat and Adhesive Process with a maximum topcoat usage of 4,000 gallons

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E) Voluntary restriction to avoid BAT	Volatile organic compound (VOC) emissions shall not exceed 3.8 tons per year.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b. below.
c.	OAC rules 3745-17-11(B)(1) and (C) and 3745-17-07(A)	See b)(2)c. below.
d.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)d. below.

(2) Additional Terms and Conditions

a. Permit to Install P0104348 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements for volatile organic compounds (VOC) under OAC rule 3745-31-05(A)(3):

i. the maximum annual top coat usage for this emissions unit shall not exceed 4,000 gallons.

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate is less than 10 tons/year.

c. Pursuant to OAC rule 3745-17-11(A)(1)(h), OAC rule 3745-17-11 does not apply to this source because only brush coatings are applied. Pursuant to OAC rule 3745-17-07(A)(3)(h), the visible particulate emission (PE) limitations in OAC rule



3745-17-07(A)(1) do not apply to a source that is not subject to a mass emission limitation in OAC rule 3745-17-11.

- d. Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and,
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.



(2) The permittee shall maintain monthly records of the coating usage in this emissions unit.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA, Southeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

(2) The permittee shall submit annual deviation (excursion) reports that identify any exceedance of the annual coating usage limitation. These reports shall be submitted by January 31 of each year and shall include information recorded during the previous calendar year.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 3.8 tons per year.

Applicable Compliance Method:  
Compliance with the annual tons per year emission limitation shall be determined based on the record keeping specified in d)(1) and (2). The emissions limitation was determined by multiplying the maximum coating VOC content by the operational limit of 4,000 gallons per year.

$$(1.9 \text{ lbs/gal})(4,000 \text{ gal/yr})(0.0005 \text{ ton/lb}) = 3.8 \text{ tons/yr}$$

b. Emission Limitation:  
Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:  
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1). Formulation data or USEPA Method 24 shall be used to determine the volatile compound contents of the coatings.

g) Miscellaneous Requirements

(1) None.