

**Synthetic Minor Determination and/or**  **Netting Determination**  
**Permit To Install 03-13670**

**A. Source Description**

Calphalon Corporation has proposed the installation of 2 conveyORIZED miscellaneous metal parts coating lines at their facility. These emission units are subject to OAC rules 3745-21-09 (U) (1) (a) and (U) (1) (c). Group limitations for individual HAPs and any combination of HAPs will be established for these coating operations.

**B. Facility Emissions and Attainment Status**

Currently, this facility is not a major source under Title V for HAPs based on emissions from PTIs previously issued for emission units at the facility. Wood County is currently designated attainment for all criteria pollutants.

**C. Source Emissions**

POTENTIAL EMISSIONS: Without any restrictions, the facility has a potential to emit greater than 10 TPY of any individual HAP and 25 TPY of any combination of HAPs.

RESTRICTING POTENTIAL EMISSIONS: The facility has requested annual emissions limitations of 9 TPY of any individual HAP and 24 TPY of any combination of HAPs to establish federally enforceable allowable emissions limitation below Title V applicability thresholds.

**D. Conclusion**

With the annual HAP emissions limitations, the facility will be below the single and aggregate HAP Title V thresholds. Therefore, the facility has established status as a synthetic minor and will not be subject to Title V.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
WOOD COUNTY  
Application No: 03-13670**

**CERTIFIED MAIL**

**DATE:** 10/18/2001

Calphalon Corporation  
Keith Sweeney  
P.O. Box 583  
Toledo, OH 436970583

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

NWDO

Toledo Met Area Coun of Gov

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STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 03-13670**

Application Number: 03-13670  
APS Premise Number: 0387040334  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Calphalon Corporation  
Person to Contact: Keith Sweeney  
Address: P.O. Box 583  
Toledo, OH 436970583

Location of proposed air contaminant source(s) [emissions unit(s)]:

**SE corner of 3rd and D streets  
Perrysburg, Ohio**

Description of proposed emissions unit(s):

**2 conveyORIZED miscellaneous metal parts teflon coating lines including primer coating, top coating, and undercoating.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements 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,

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the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If 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).

**Calphalon Corporation**

**Facility ID: 0387040334**

**PTI Application: 03-13670**

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- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up

Emissions Unit ID: **K003**

to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	84.98
Individual HAP	9.00
Aggregate HAPs	24.00

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#3 conveyorized miscellaneous metal parts primer and topcoat spray coating line with waterwash	OAC rule 3745-31-05 (A) (3)	9.70 lbs VOC/hr & 42.49 tons VOC/yr.
	OAC rule 3745-21-09 (U) (1) (a)	4.3 pounds VOC per gallon of coating, excluding water and exempt solvents, for a clear coating
	OAC rule 3745-21-09 (U) (1) (c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05 (D)	Group Limit for K003 and K004: 9.00 tons per rolling 12-month period of any individual HAP* and 24.00 tons per rolling 12-month period of any combination of HAPs (see A.2.a)

\* Hazardous Air Pollutant (HAP) as defined in Section 112 (b) of the Clean Air Act.

**2. Additional Terms and Conditions**

- 2.a The permittee has requested federally enforceable limitations for emissions units K003 and K004 combined of 9.00 tons of any individual HAP and 24.00 tons of combined HAPs per rolling 12-month period for the purpose of avoiding Title V applicability (see B.1.).

**B. Operational Restrictions**

1. Combined annual HAP emissions from emissions units K003 and K004 shall not exceed 9.00 tons per year for any individual HAP and 24.00 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.75	2.00
1-2	1.50	4.00
1-3	2.25	6.00
1-4	3.00	8.00
1-5	3.75	10.00
1-6	4.50	12.00
1-7	5.25	14.00
1-8	6.00	16.00
1-9	6.75	18.00
1-10	7.50	20.00
1-11	8.25	22.00
1-12	9.00	24.00

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.00 tons and 24.00 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for emissions units K003 & K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl acetate

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PTI A**

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TLV (mg/m<sup>3</sup>): 713,000

Maximum Hourly Emission Rate (lbs/hr): 1.22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 19.35

MAGLC (ug/m<sup>3</sup>): 16,970

Pollutant: Furfural Alcohol

TLV (mg/m<sup>3</sup>): 40,122

Maximum Hourly Emission Rate (lbs/hr): 0.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 7.12

MAGLC (ug/m<sup>3</sup>): 955

Pollutant: Methyl Amyl Ketone

TLV (mg/m<sup>3</sup>): 233,538

Maximum Hourly Emission Rate (lbs/hr): 1.80

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 28.65

MAGLC (ug/m<sup>3</sup>): 5560

Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434,192

Maximum Hourly Emission Rate (lbs/hr): 2.38

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 37.82

MAGLC (ug/m<sup>3</sup>): 10,338

Physical changes to or changes in the method of operation of the emissions unit after its

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower

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Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall collect and record the following information each month for the coating line:
- a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in pounds per gallon, as applied.
  - c. The VOC content of each coating excluding water and exempt solvents, in pounds per gallon, as applied.
  - d. The number of gallons of each coating employed.

**Calphalon Corporation**  
**PTI A**  
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**Facility ID: 0387040334**

**Emissions Unit ID: K003**

- e. The VOC emission rate for each coating employed (b x d), in pounds per month.

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- f. The total VOC emission rate for all coatings employed (sum of e), in pounds per month.
  - g. The annual, year to date VOC emissions from all coatings employed (sum of (f), in tons, for each calendar month to date from January to December).
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K003 and K004:
- a. The company identification of each coating employed.
  - b. The pounds per gallon of each HAP in each coating, as applied.
  - c. The number of gallons of each coating employed.
  - d. The emissions rate for each HAP from each coating employed (b x c).
  - e. The total emission rate for each HAP from all coatings employed, summation of (d) for each HAP in pounds per month.
  - f. The total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e) for all HAPs in pounds per month.
  - g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
  - h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation of 42.49 tons VOC/yr. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover

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PTI A**

Emissions Unit ID: **K003**

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the previous calendar year.

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. The notification shall

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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. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions units K003 & K004 as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable cumulative HAP emission rates for each HAP and total combined HAPs as specified in section B.1. of this permit.
  - b. Any exceedances of the group limits for K003 and K004 combined of 9.00 tons per rolling 12-month period of any individual HAP and 24.00 tons per rolling 12-month period of any combination of HAPs.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 9.70 lbs VOC/hr

Applicable Compliance Method: The hourly VOC emission limitation is based on the emission units potential to emit\*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\* The potential to emit for this emissions unit was based on the summation of the products of the maximum VOC content and maximum hourly usage rate for each coating employed in this emissions unit. The maximum VOC content and maximum hourly usage rates are as follows:

Coating	Maximum VOC content	Maximum Hourly Usage Rate
Waterbased Primer	0.38 lb/gallon	3.5724
Top Coat	3.45 lbs/gallon	2.3824
Waterbased Coating (Undercoat)	0.21 lb/gallon	0.5924

- b. Emission Limitation: 42.49 tons VOC/yr

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping requirements specified in section C.2. of this permit.

**Calphalon Corporation**  
**PTI A**  
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**Facility ID: 0387040334**

**Emissions Unit ID: K003**

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- c. Emission Limitation: 4.3 pounds VOC per gallon of coating, excluding water and exempt solvents, for a clear coating

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section C.2. of this permit. In accordance with OAC rule 3745-21-04 (B) (5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60 Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.

- d. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section C.2. of this permit. In accordance with OAC rule 3745-21-04 (B) (5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60 Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.

- e. Emission Limitation: 9.00 tons per rolling 12-month period of any individual HAP and 24.00 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping requirements specified in section C.3. of this permit.

**F. Miscellaneous Requirements**

- 1. None.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#4 conveyorized miscellaneous metal parts primer and topcoat spray coating line with waterwash	OAC rule 3745-31-05 (A) (3)	9.70 lbs VOC/hr & 42.49 tons VOC/yr.
	OAC rule 3745-21-09 (U) (1) (a)	4.3 pounds VOC per gallon of coating, excluding water and exempt solvents, for a clear coating
	OAC rule 3745-21-09 (U) (1) (c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05 (D)	Group Limit for K003 and K004: 9.00 tons per rolling 12-month period of any individual HAP* and 24.00 tons per rolling 12-month period of any combination of HAPs (see A.2.a)

\* Hazardous Air Pollutant (HAP) as defined in Section 112 (b) of the Clean Air Act.

**2. Additional Terms and Conditions**

- 2.a The permittee has requested federally enforceable limitations for emissions units K003 and K004 combined of 9.00 tons of any individual HAP and 24.00 tons of combined HAPs per rolling 12-month period for the purpose of avoiding Title V applicability (see B.1.).

**Calphalon Corporation**  
**PTI A**  
**Issued**

**Facility ID: 0387040334**

**Emissions Unit ID: K004**

**B. Operational Restrictions**

1. Combined annual HAP emissions from emissions units K003 and K004 shall not exceed 9.00 tons per year for any individual HAP and 24.00 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

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PTI A

Emissions Unit ID: **K004**

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To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.75	2.00
1-2	1.50	4.00
1-3	2.25	6.00
1-4	3.00	8.00
1-5	3.75	10.00
1-6	4.50	12.00
1-7	5.25	14.00
1-8	6.00	16.00
1-9	6.75	18.00
1-10	7.50	20.00
1-11	8.25	22.00
1-12	9.00	24.00

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.00 tons and 24.00 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for emissions units K003 & K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: butyl acetate

TLV (mg/m<sup>3</sup>): 713,000

Maximum Hourly Emission Rate (lbs/hr): 1.22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 19.35

MAGLC (ug/m<sup>3</sup>): 16,970

Pollutant: Furfural Alcohol

TLV (mg/m<sup>3</sup>): 40,122

Maximum Hourly Emission Rate (lbs/hr): 0.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 7.12

MAGLC (ug/m<sup>3</sup>): 955

Pollutant: Methyl Amyl Ketone

TLV (mg/m<sup>3</sup>): 233,538

Maximum Hourly Emission Rate (lbs/hr): 1.80

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 28.65

MAGLC (ug/m<sup>3</sup>): 5560

Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434,192

Maximum Hourly Emission Rate (lbs/hr): 2.38

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 37.82

MAGLC (ug/m<sup>3</sup>): 10,338

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

2. The permittee shall collect and record the following information each month for the coating line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in pounds per gallon, as applied.
  - c. The VOC content of each coating excluding water and exempt solvents, in pounds per gallon, as applied.
  - d. The number of gallons of each coating employed.
  - e. The VOC emission rate for each coating employed (b x d), in pounds per month.
  - f. The total VOC emission rate for all coatings employed (sum of e), in pounds per month.
  - g. The annual, year to date VOC emissions from all coatings employed (sum of f), in tons, for each calendar month to date from January to December).
  
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K003 and K004:
  - a. The company identification of each coating employed.
  - b. The pounds per gallon of each HAP in each coating, as applied.
  - c. The number of gallons of each coating employed.
  - d. The emissions rate for each HAP from each coating employed (b x c).
  - e. The total emission rate for each HAP from all coatings employed, summation of (d) for each HAP in pounds per month.
  - f. The total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e) for all HAPs in pounds per month.
  - g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
  - h. After the first 12 months of operation under the provisions of this permit, the annual

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emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation of 42.49 tons VOC/yr. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.
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. 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. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions units K003 & K004 as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum emission limitations for each HAP and total combined HAPs as specified in section B.1. of this permit.
  - b. Any exceedances of the group limits for K003 and K004 combined of 9.00 tons per rolling 12-month period of any individual HAP and 24.00 tons per rolling 12-month period of any combination of HAPs.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 9.70 lbs VOC/hr

Applicable Compliance Method: The hourly VOC emission limitation is based on the

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emission units potential to emit\*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\* The potential to emit for this emissions unit was based on the summation of the products of the maximum VOC content and maximum hourly usage rate for each coating employed in this emissions unit. The maximum VOC content and maximum hourly usage rates are as follows:

Coating	Maximum VOC content	Maximum Hourly Usage Rate
Waterbased Primer	0.38 lb/gallon	3.5724
Top Coat	3.45 lbs/gallon	2.3824
Waterbased Coating (Undercoat)	0.21 lb/gallon	0.5924

b. Emission Limitation: 42.49 tons VOC/yr

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping requirements specified in section C.2. of this permit.

c. Emission Limitation: 4.3 pounds VOC per gallon of coating, excluding water and exempt solvents, for a clear coating

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section C.2. of this permit. In accordance with OAC rule 3745-21-04 (B) (5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60 Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.

d. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section C.2. of this permit. In accordance with OAC rule 3745-21-04 (B) (5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60 Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to

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demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emission Limitation: 9.00 tons per rolling 12-month period of any individual HAP and 24.00 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be determined based upon the recordkeeping requirements specified in section C.3. of this permit.

**F. Miscellaneous Requirements**

- 1. None.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13670 Facility ID: 0387040334

FACILITY NAME Calphalon Corporation

FACILITY DESCRIPTION 2 conveyORIZED miscellaneous metal parts CITY/TWP Perrvsburg

Emissions Unit ID: **K004**

SIC CODE 3479 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Number 3 primer and top coat conveyORIZED miscellaneous metal parts spray coating line with waterwash.

DATE INSTALLED 5-30-01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Volatile Organic Compounds	Attainment	9.70 lbs/hr	19.40	9.70 lbs/hr	42.49
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? N NESHAP? N PSD? N OFFSET POLICY? N

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y  
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: butyl acetate, furfural, MAK, Xylene

