

#### SYNTHETIC MINOR DETERMINATION

1. Source Description: Unverferth d.b.a. Kill Brothers constructs grain wagons for the agriculture industry. Volatile organic compound (VOC) emissions are associated with the coating operations.
2. County/Facility Classification: The company is located in Delphos, OH (Van Wert County). Van Wert County is classified as an attainment county for all pollutants. Unverferth d.b.a. Kill Brothers is presently classified as a major facility for Title V applicability (VOC >100 TPY) and for PSD purposes (VOC > 250 TPY). The facility's actual VOC emissions have never exceeded 100 TPY and are presently at approximately 40 TPY. This permit action will not affect the classification of the facility in any manner.
3. Synthetic Minor Limitation: Potential VOC emission increases at the facility, as the result of the modification of this emissions unit, would be >40 TPY and therefore be subject to PSD permitting requirements. In order to avoid PSD review "federally enforceable" terms and conditions must be included in the permit to install (PTI). In this case, organic compound (OC) emission limits will be placed on the emission units in this permit. Restricting OC emissions is an acceptable method to restrict VOC emissions.
4. Conclusion: As part of the company's strategy to avoid triggering a PSD review, this PTI incorporates federally enforceable OC emissions limits of 31.6 TPY.

**AIR EMISSIONS SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Unverferth d.b.a. Kill Brothers** located in **Van Wert** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table below. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<b><u>OHIO EPA EMISSIONS U N I T NUMBER</u></b>	<b><u>EMISSIONS UNIT IDENTIFICATION DESCRIPTION</u></b>	<b><u>BEST AVAILABLE TECHNOLOGY DETERMINATION</u></b>	<b><u>APPLICABLE FEDERAL &amp; OAC RULES</u></b>	<b><u>P E R M I T ALLOWABLE MASS EMISSIONS OR CONTROL &amp; USAGE REQUIREMENTS</u></b>
R004 (mod)	Paint Spray Booth -  (modification to allow for an increase in the mass emission rates)	Use of dry filter and compliance with the terms and conditions of this permit	3745-31-05	Coating: 42.0 lbs OC/hr & 28.5 TPY (See AST&Cs)  Cleanup: 680 lbs OC/month & 3.1 TPY
			3745-21-09 (U)	3 . 5 l b s VOC/gallon minus water and exempt solvents
			3745-17-11 (A)	PM Emissions: UMRE<10 lbs/hr No limit established.
			3745-17-07 (A)	20% opacity, as a six-minute average

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<b><u>Pollutant</u></b>	<b><u>Tons/Year</u></b>
OC	31.6*

\*This PTI reflects an increase of 14.5 TPY over previous permit limits.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**INTRODUCTION:**

The purpose of this permit to correct permit limits for a paint spray booth at the Unverferth d.b.a. Kill Brothers Company located in Delphos, Ohio. The spray booth, emissions unit R004 was installed in 1976 and modified in 1982. The permittee had originally provided erroneous potential to emit (PTE) information, which formed the basis of the permit limits in the previous Permit to Install, PTI #03-10570. Due to a significantly higher PTE, this permit will also establish federally enforceable limits on annual OC emissions to below levels which would trigger a PSD review.

**A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS**

1. Organic compound (OC) emissions from the application of coatings in emissions unit R004 shall be limited to 42.0 pounds per hour. Total OC emissions from the application of coatings shall not exceed 28.5 tons per year, based on a rolling, 12 month summation of the monthly input rates. This is an existing emissions unit, and for the purposes of demonstrating compliance with the first 12 months of the rolling restriction, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.
2. The permittee shall employ a dry exhaust filtration system while emissions unit R004 is in operation.

**B. OPERATIONAL RESTRICTIONS**

1. This permit allows for the use of the coatings and cleanup materials specified by the permittee in PTI number 03-13061. Any of the following circumstances would require prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 03-13061 and the operating permit:
  - a. Any changes to the emissions unit or its method of operation that would require an increase in the emission limitations established by this permit.
  - b. Any other changes which would otherwise be considered a "modification" as defined in OAC rule 3745-31-01

**C. MONITORING AND/OR RECORD KEEPING REQUIREMENTS**

1. The permittee shall collect and record the following information each month in conjunction with the application of coating materials in emissions unit R004:
  - a. The name and identification for each coating employed.
  - b. The OC content of each coating, in pounds per gallon.
  - c. The VOC content of each coating, in pounds per gallon minus water and exempt solvents.
  - d. The number of gallons of each coating employed.
  - e. The total OC emission rate for all coatings, in pounds per month.
  - f. The annual emissions of OC based upon a rolling 12 month summation of the monthly input rates.

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

2. The permittee shall collect and record the following information each month in conjunction with the application of cleanup materials in emissions unit R004:
  - a. The name and identification for each cleanup material employed.
  - b. The OC content of each cleanup material, in pounds per gallon.
  - c. The number of gallons of each cleanup material employed.
  - d. The total OC emissions from each cleanup material in pounds per month.
  - e. The total OC emissions from all cleanup materials, in pounds per month.
  - f. The total cumulative OC emissions for the calendar year to date, in tons.

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

Note: The permittee may also calculate monthly OC emissions rates in accordance with the following formula if waste cleanup materials

are sent off-site for reclamation/disposal:

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

3. 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 strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**D. 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. 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. Except as otherwise provided in the condition D.1. above, 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 record keeping 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, Northwest 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 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. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
4. The actual annual emissions data for the emissions unit

shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

**E. TESTING REQUIREMENTS**

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

- a. Emission Limitation:

3.5 lbs VOC/gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of the coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

- b. Emission Limitation:

42.0 lbs OC/hr for the coating operation

Applicable Compliance Method:

The hourly OC limits are based on the emissions unit's potential to emit. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

- c. Emission Limitation:

28.5 tons OC/rolling 12 month average for the coating operation

Applicable Compliance Method:

Compliance shall be based upon the record keeping

specified in Section C above.

d. Emission Limitation:

680 lbs OC/month 3.1 tons OC/yr for the cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in section C above.

e. Emission Limitation:

20% Opacity as a six-minute average

Applicable Compliance Method:

OAC 3745-17-03(B)(1).

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

**F. MISCELLANEOUS REQUIREMENTS**

This PTI supersedes the requirements of PTI# 03-10570 for emissions unit R004.