State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
RICHLAND COUNTY
Application No: 03-3241

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
X	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: November 10, 1999

Pan-Glo Mansfield
Scott Mouton
417 East Water Street
Urbana, OH 43078

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: **USEPA**
DAPC, NWDO

FINAL PERMIT TO INSTALL 03-3241

Application Number:	03-3241
APS Premise Number:	0370010203
Permit Fee:	**$800**
Name of Facility:	Pan-Glo Mansfield
Person to Contact:	Scott Mouton
Address:	417 East Water Street Urbana, OH 43078

Location of proposed air contaminant source(s) [emissions unit(s)]:
1711 North Main Street
Mansfield, **Ohio**

Description of proposed emissions unit(s):
2 SOLVENT METAL COLD CLEANERS & 2 MISCELLANEOUS METAL PARTS COATING LINES W/OVENS.

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

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, 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 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 are inadequate 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 prove to be inadequate 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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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

Pollutant	Tons Per Year
VOC	47.5

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Solvent Metal Cold Cleaner (Line #1)	OAC rule 3745-31-05	3.98 tons VOC/yr
	OAC rule 3745-21-09 (O) (2)	Work Practices and Control Design (See A.2. below)

2. Additional Terms and Conditions

2.a The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measure at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.

2.b The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

2.c The cold cleaner cover shall be closed at all times except when loading and unloading parts.

2.d The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

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

ii. Store waste solvent in covered containers.

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

iv. Drain the cleaned parts until dripping ceases.

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

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

2.e The permittee shall maintain a freeboard ratio of greater than or equal to 0.7.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:

   a. The company identification for all solvents employed in the cold cleaner.

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

   c. The organic compounds content for each solvent employed.

   d. The number of gallons of each solvent employed.

   e. The organic compound emission rate for each solvent employed © x d)

   f. The total organic compound emission rate for all solvents employed (sum of c).

   The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

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

   g. The annual, year to date VOC emissions from all solvent material usage (sum of f for each calendar month to date from January to December).

D. Reporting Requirements

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in section A.1. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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E. Testing Requirements

1. Compliance with the emission limitations in this permit to install shall be determined in accordance with the following methods:

   Emission Limitation: 3.98 tons VOC/yr

   Applicable Compliance Method: Compliance with the annual organic compound emission limit shall be based upon the recordkeeping requirements contained in section B.1. of this permit.

F. Miscellaneous Requirements

None.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Solvent Metal Cold Cleaner (Line #2)	OAC rule 3745-31-05	4.99 tons VOC/yr
	OAC rule 3745-21-09 (O) (2)	Work Practices and Control Design (See A.2. below)

2. Additional Terms and Conditions

2.a The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measure at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.

2.b The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

2.c The cold cleaner cover shall be closed at all times except when loading and unloading parts.

2.d The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

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

ii. Store waste solvent in covered containers.

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

iv. Drain the cleaned parts until dripping ceases.

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

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

2.e The permittee shall maintain a freeboard ratio of greater than or equal to 0.7.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:

   a. The company identification for all solvents employed in the cold cleaner.

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

   c. The organic compounds content for each solvent employed.

   d. The number of gallons of each solvent employed.

   e. The organic compound emission rate for each solvent employed © x d)

   f. The total organic compound emission rate for all solvents employed (sum of c).

   The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

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

   g. The annual, year to date VOC emissions from all solvent material usage (sum of f for each calendar month to date from January to December).

D. Reporting Requirements

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in section A.1. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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E. Testing Requirements

1. Compliance with the emission limitations in this permit to install shall be determined in accordance with the following methods:

   Emission Limitation: 4.99 tons VOC/yr

   Applicable Compliance Method: Compliance with the annual organic compound emission limit shall be based upon the recordkeeping requirements contained in section B.1. of this permit.

F. Miscellaneous Requirements

None.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Miscellaneous Metal Parts Coating Line #1	OAC rule 3745-31-05	6.42 lbs VOC/hr & 28.1 tons VOC/yr from coating operations 362.5 lbs VOC/month & 2.18 tons VOC/yr from cleanup operations
	OAC rule 3745-21-09 (B) (6)	See A.2.a
	OAC rule 3745-21-09 (U) (1) (i)	See A.2.a

2. Additional Terms and Conditions

2.a In lieu of complying with the pounds of volatile organic material (VOC) per gallon of solids limitation contained in OAC rule 3745-21-09 (U) (1) (i), the permittee has chosen to employ a control system and will demonstrate the capture and control equipment provide not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control system in accordance with OAC rule 3745-21-09 (B) (6).

B. Operational Restrictions

1. The permittee shall operate a thermal incinerator at all times when the emissions unit is in operation.

2. The average combustion temperature, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This permit allows for the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for the proposed installation of emissions units K001 & K002. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and

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are based on both the materials used and the design parameters of the emission unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Emission Units: K001 & K002

Pollutant: Toluene*

TLV (ug/m^3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8.32

Predicted 1-hour maximum Ground-Level Concentration (ug/m^3): 391.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m^3) : 4476

*The following additional conservative assumptions were made in the Screen modeling:

For the following emissions units: K001 & K002, the remaining emissions of toxic compounds in the coatings or cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds.

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process <u>may</u> be determined to be a "modification":

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

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a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

   b. A log for the capture (collection) system, control device and monitoring equipment which includes the following:

      i. Downtime when the associated emission unit was in operation.

      ii. Operating time.

3. The permittee shall collect and record the following information each month for coating/cleanup material usage in this emissions unit:

   a. The company identification for each coating/cleanup material employed.

   b. The number of gallons of each coating/cleanup material employed.

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c. The volatile organic compound (VOC) content of each coating employed, in lbs/gallon, as applied

d. The volatile organic compound (VOC) content of each cleanup material, in lbs/gallon.

e. The total VOC emission rate for all coatings, in lbs/month (sum of c*b for each coating)

f. The total VOC emission rate for all cleanup materials, in lbs/month (sum of d*b for each cleanup material).

g. The annual, year to date OC emissions from all coating material usage (sum of e for each calendar month to date from January to December).

h. The annual, year to date OC emissions from all cleanup material usage (sum of f for each calendar month to date from January to December).

4. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change ins stack/exhaust parameters, etc.); and,

b. a copy of resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. The permittee shall submit annual written reports of any deviations (excursions) from the annual coating/cleanup material emissions limitations in section A.1. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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b. The permittee shall submit quarterly written reports of any deviations (excursions) from the monthly cleanup material emission limitation in section A.1.

E. Testing Requirements

1. Testing Requirements

a. Emissions testing shall be conducted within 3 months after startup of this emissions unit.

b. The emission testing shall be determined in conformance with OAC rule 3745-21-10 to demonstrate compliance with an overall control efficiency of 81% for VOC and a control equipment efficiency of not less than 90% for VOC.

c. Method 25 or 25A of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the overall control efficiency of 81% for VOC and a control equipment efficiency of not less than 90% for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency used in determining overall control efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative method if such method does not contravene any other applicable requirement.) The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of the potential presence of interfering gases.

e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid

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characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance Methods Requirements:

a. Emission Limitation: 6.42 lbs VOC/hr from coating operations

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 with this limitation.

*The potential to emit for this emissions unit was based on a maximum VOC content of 5.8 lbs per gallon, a maximum hourly usage rate of 5.82 gallons per hour, and an overall control efficiency of 81%.

b. Emission Limitation: 28.1 tons VOC/yr from coating operations

Applicable Compliance Method: Compliance shall be based on recordkeeping requirements contained in section C.3. of this permit.

c. Emission Limitation: Use of control system with 81% overall control efficiency rate for VOC and a control equipment efficiency of not less than 90% for VOC..

Applicable Compliance Method: Compliance with this limitation will be based on the required testing in section E.1.

d. Emission Limitation: 362.5 lbs VOC/month & 2.18 tons VOC/yr

Applicable Compliance Method: Compliance with these limitations shall be based on recordkeeping requirements contained in section C.3. of this permit.

F. Miscellaneous Requirements

None.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Miscellaneous Metal Parts Coating Line #2	OAC rule 3745-31-05	1.38 lbs VOC/hr & 6.04 tons VOC/yr from coating operations 362.5 lbs VOC/month & 2.18 tons VOC/yr from cleanup operations
	OAC rule 3745-21-09 (B) (6)	See A.2.a
	OAC rule 3745-21-09 (U) (1) (i)	See A.2.a

2. Additional Terms and Conditions

2.a In lieu of complying with the pounds of volatile organic material (VOC) per gallon of solids limitation contained in OAC rule 3745-21-09 (U) (1) (i), the permittee has chosen to employ a control system and will demonstrate the capture and control equipment provide not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control system in accordance with OAC rule 3745-21-09 (B) (6).

B. Operational Restrictions

1. The permittee shall operate a thermal incinerator at all times when the emissions unit is in operation.

2. The average combustion temperature, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This permit allows for the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for the proposed installation of emissions units K001 & K002. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission

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limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emission unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Emission Units: K001 & K002

Pollutant: Toluene*

TLV (ug/m^3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8.32

Predicted 1-hour maximum Ground-Level Concentration (ug/m^3): 391.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m^3) : 4476

*The following additional conservative assumptions were made in the Screen modeling:

For the following emissions units: K001 & K002, the remaining emissions of toxic compounds in the coatings or cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds.

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process <u>may</u> be determined to be a "modification":

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and,

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

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a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

   b. A log for the capture (collection) system, control device and monitoring equipment which includes the following:

      i. Downtime when the associated emission unit was in operation.

      ii. Operating time.

3. The permittee shall collect and record the following information each month for coating/cleanup material usage in this emissions unit:

   a. The company identification for each coating/cleanup material employed.

   b. The number of gallons of each coating/cleanup material employed.

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c. The volatile organic compound (VOC) content of each coating employed, in lbs/gallon, as applied

d. The volatile organic compound (VOC) content of each cleanup material, in lbs/gallon.

e. The total VOC emission rate for all coatings, in lbs/month (sum of c*b for each coating)

f. The total VOC emission rate for all cleanup materials, in lbs/month (sum of d*b for each cleanup material).

g. The annual, year to date OC emissions from all coating material usage (sum of e for each calendar month to date from January to December).

h. The annual, year to date OC emissions from all cleanup material usage (sum of f for each calendar month to date from January to December).

4. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change ins stack/exhaust parameters, etc.); and,

b. a copy of resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. The permittee shall submit annual written reports of any deviations (excursions) from the annual coating/cleanup material emissions limitations in section A.1. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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b. The permittee shall submit quarterly written reports of any deviations (excursions) from the monthly cleanup material emission limitation in section A.1.

E. Testing Requirements

1. Testing Requirements

a. Emissions testing shall be conducted within 3 months after startup of this emissions unit.

b. The emission testing shall be determined in conformance with OAC rule 3745-21-10 to demonstrate compliance with an overall control efficiency of 81% for VOC and a control equipment efficiency of not less than 90% for VOC.

c. Method 25 or 25A of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the overall control efficiency of 81% for VOC and a control equipment efficiency of not less than 90% for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency used in determining overall control efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative method if such method does not contravene any other applicable requirement.) The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of the potential presence of interfering gases.

e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid

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characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance Methods Requirements:

a. Emission Limitation: 1.38 lbs VOC/hr from coating operations

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 with this limitation.

*The potential to emit for this emissions unit was based on a maximum VOC content of 5.8 lbs per gallon, a maximum hourly usage rate of 1.25 gallons per hour, and an overall control efficiency of 81%.

b. Emission Limitation: 6.04 tons VOC/yr from coating operations

Applicable Compliance Method: Compliance shall be based on recordkeeping requirements contained in section C.3. of this permit.

c. Emission Limitation: Use of control system with 81% overall control efficiency rate for VOC and a control equipment efficiency of not less than 90% for VOC..

Applicable Compliance Method: Compliance with this limitation will be based on the required testing in section E.1.

d. Emission Limitation: 362.5 lbs VOC/month & 2.18 tons VOC/yr

Applicable Compliance Method: Compliance with these limitations shall be based on recordkeeping requirements contained in section C.3. of this permit.

F. Miscellaneous Requirements

None.

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