

2 of 13 Pages

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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.

3 of 13 Pages

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

4 of 13 Pages

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

Facility Name: **Yarder Manufacturing Company**Application Number: **04-1156**Date: **February 18, 1999**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Yarder Manufacturing Company** located in **Lucas** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K001	Miscellaneous metal parts coating line	<10 gpd. water wash particulate control. Compliance with Air Toxics Policy.	3745-31-05	No visible emissions from the stack, 0.78 pound of particulate matter (PM) per day, 0.14 ton of PM per year, 53.8 pounds of volatile organic compounds (VOC) per day, and 9.8 tons of VOC per year.
			*3745-17-07 (A)(1)	See below.
			*3745-17-11 (B)(1)	See below.
			3745-21-09 (U)(2)(e)(ii)	VOC emissions exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day.

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

- * The emission limitation established by this applicable rule is less stringent than the emission limitation established through the best available technology determination of OAC rule 3745-31-05.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	0.14
VOC	9.8

CONSTRUCTION STATUS

The **Toledo Environmental Services Division** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **K001**.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Environmental Services Division, 348 South Erie Street, Toledo, OH 43602**.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

7 of 13 Pages

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Environmental Services Division, 348 South Erie Street, Toledo, OH 43602.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Additional Terms and Conditions

1. None.

B. Operational Restrictions

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and,
 - c. the total volume, in gallons, of all of the coatings employed.
3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the VOC content of each coating, as applied, in pounds per gallon; and,
 - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information for each change where the 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 in stack/exhaust parameters, etc.); and,

- b. a copy of the 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 notify the Toledo Division of Environmental Services in writing of any daily record showing that the water curtain was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the event occurs.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director Toledo Division of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

- a. Emissions Limitation

no visible emissions from the stack.

Applicable Compliance Method

Compliance shall be determined through the monitoring and record keeping requirements of Section C.1. If required the permittee shall also demonstrate compliance with this emissions limitation through visible emissions observations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emissions Limitation

0.78 pound of particulate matter (PM) per day.

Applicable Compliance Method

Compliance shall be determined through the monitoring and recordkeeping requirements of Section C.1. If required the permittee shall also demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B) (10).

c. Emissions Limitation

0.14 ton of PM per year.

Applicable Compliance Method

Compliance shall be determined through the monitoring and recordkeeping requirements of Section C.1.

d. Emissions Limitation

53.8 pounds of volatile organic compounds (VOC) per day.

Applicable Compliance Method

Compliance shall be determined through the monitoring and recordkeeping requirements of Section C.2. A rate of coating usage, not to exceed 10 gallons of coating in any one day, will be considered adequate demonstration of compliance. If required, the permittee shall also demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in OAC rule 3745-21-09(B) and OAC rule 3745-21-10. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and cleanup materials.

e. Emissions Limitation

9.8 tons of VOC per year.

Applicable Compliance Method

Compliance shall be determined through the monitoring and recordkeeping requirements of Section C.2. A rate of coating usage, not to exceed 10 gallons of coating in any one day, will be considered adequate demonstration of compliance.

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. 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 was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions 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:

Pollutant: Toluene

TLV (ug/m3): 50,000

Maximum Hourly Emission Rate (lbs/hr): 0.46

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29

MAGLC (ug/m3): 1,190

Pollutant: Xylene

TLV (ug/m3): 100,000

Maximum Hourly Emission Rate (lbs/hr): 0.53

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33

MAGLC (ug/m3): 2,380

Pollutant: Methyl Ethyl Ketone

TLV (ug/m3): 200,000

Maximum Hourly Emission Rate (lbs/hr): 0.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37

MAGLC (ug/m3): 4,760

Pollutant: Cyclo-hexanone

TLV (ug/m3): 25,000

Maximum Hourly Emission Rate (lbs/hr): 0.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37

MAGLC (ug/m3): 600

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

Pollutant: N-butyl Acetate

TLV (ug/m3): 150,000

Maximum Hourly Emission Rate (lbs/hr): 0.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37

MAGLC (ug/m3): 3,570

2. 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 may be determined to be a "modification:"
 - 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 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.
3. 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:
 - 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,

13 of 13 Pages

Facility Name: **Yarder Manufacturing Company**

Application Number: **04-1156**

Date: **February 18, 1999**

- 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.
4. 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.