

Facility Name: ITW Welding Products Group - Welding Equipment
Operations
OEPA Premises # 0855140008
PTI #08-3797

ADDITIONAL SPECIAL TERMS & CONDITIONS

1. The 3.70 lbs/hour limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

Operational Restrictions

2. The dip tanks shall be equipped with covers that shall be used when the tanks are not in use.

Monitoring and/or Record Keeping Requirements

3. The permittee shall collect and record the following information each month for the dip tanks:
 - a. The name and identification number of the varnish.
 - b. The VOC content of the varnish (excluding water and exempt solvents).
 - c. The number of gallons (excluding water and exempt solvents) of the varnish employed.
 - d. The total VOC emissions from the varnish employed, in pounds or tons.

Reporting Requirements

4. 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.
5. 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.

Testing Requirements and/or Compliance Method Determinations

6. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation - 3.70 lbs/hour volatile organic compounds

Applicable Compliance Method - Compliance shall be determined by multiplying the maximum allowable VOC content (2.7 lbs VOC/gallon) by the maximum hourly varnish usage.

- b. Emission Limitation - 16.21 TPY volatile organic compounds
Applicable Compliance Method - Compliance shall be based upon record keeping as specified in term and condition number 3, and shall be the sum of the monthly VOC emission rates for the calendar year.
- c. Emission Limitation - 2.70 lbs VOC/gallon, minus water and exempt solvents
Applicable Compliance Method - USEPA Method 24 shall be used to determine the VOC contents for 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 so 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.

Miscellaneous Requirements

7. This permit allows the use of the varnish specified by the permittee in the application for PTI number 08-3797. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the volatile organic compound emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on both the varnish formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

Pollutant: 2-Butoxyethanol
TLV (ug/m3): 121,000
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 121.5
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 1,210

8. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, 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 08-3797 and the operating permit:

- a. Any changes in the composition of the varnish, or the use of a new varnish, 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. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
 - c. Any change to the emissions unit or its method of operation that would either 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.
 - d. Any change in the composition of the varnish, or use of a new varnish, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - e. Any change in the composition of the varnish, or use of a new varnish, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
9. The terms and conditions of this permit to install, 08-3797, shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 08-3301, as issued on August 9, 1995.

Prepared by: Julie L. Ray
Date: December 24, 1997