

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **01-08888**

**A. Source Description**

Westerman Companies has proposed to install a new emissions unit in Bremen, Ohio, in Fairfield County. The facility has submitted an application for a Synthetic Minor Permit to Install for one downdraft paint spray operation (K011). Without the federally enforceable restrictions specified in this permit, the facility triggers Title V permitting for single Hazardous Air Pollutant (HAP), combined HAPs and possibly MACT for Miscellaneous Metal Parts. They have proposed to limit HAP emissions, along with coating and cleanup usage in order to be a Synthetic Minor.

**B. Facility Emissions and Attainment Status**

Westerman Companies is proposing to install this emissions unit which would be classified as a Title V facility for a single HAP and combination of HAPS, if not for the federally enforceable restrictions specified in this permit. Fairfield County was re-designated as non-attainment for ozone on June 15, 2004. The total emissions for non-hazardous air pollutant containing VOC materials is below 40 tons per year. These emissions, and the hourly and yearly limits established in this permit to install, are calculated at the maximum potential throughput (worst case scenario).

**C. Source Unit Emissions**

Without federally enforceable restrictions, potential annual emissions for HAP and HAPs from this emissions unit, would be greater than 10 tons of a single HAP and 25 tons for combined HAPs. Limiting contents of paint coatings and cleanup materials usage will reduce the emissions of the single HAP and combination of HAPs below the Title V thresholds noted above. The synthetic minor requirements of this permit will limit HAPs emissions, from this emissions unit, to 1.2 tons for an individual HAP and 3.4 tons for a combination of HAPs per rolling, 12-month summation.

**D. Conclusions**

Westerman Companies will become a Synthetic Minor facility by means of limiting the single HAP and combination of HAPs emissions to below the Major Stationary Source Title V operating permit requirements threshold levels. The lower HAPs limits will be achieved by limiting contents of paint coatings and cleanup materials usage on a rolling, 12 month basis. Compliance will be maintained with monthly monitoring, record keeping and calculations, along with quarterly deviation reports. This facility will remain a minor source because the allowable permitted emissions will not exceed the emissions limit thresholds which would require a Title V operating permit for a below major stationary source.



State of Ohio Environmental Protection Agency

Street Address:

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

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

**RE: DRAFT PERMIT TO INSTALL**

**FAIRFIELD COUNTY**

**Application No:** 01-08888

**Fac ID:** 0123000234

**DATE:** 11/16/2004

Westerman Companies  
Barry Keller  
Post Office Box 125 245 N Broad St  
Bremen, OH 43107

**CERTIFIED MAIL**

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

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 **\$400** 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.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CDO

KY

**FAIRFIELD COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08888 FOR AN AIR CONTAMINANT SOURCE FOR  
Westerman Companies**

On 11/16/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Westerman Companies**, located at **245 N Broad St, Bremen, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08888:

**Downdraft paint booth number 5.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417  
[(614)728-3778]



**DRAFT PERMIT TO INSTALL 01-08888**

Application Number: 01-08888  
Facility ID: 0123000234  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Westerman Companies  
Person to Contact: Barry Keller  
Address: Post Office Box 125 245 N Broad St  
Bremen, OH 43107

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**245 N Broad St  
Bremen, Ohio**

Description of proposed emissions unit(s):  
**Downdraft paint booth number 5.**

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

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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **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 ninety (90) 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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC               | 38.8                 |
| Individual HAP   | 1.6                  |
| Combined HAP     | 3.4                  |
| PE               | 1.3                  |

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

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

- 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>  |
|---|--|---|
| K011 - Building No. 15<br>Paint Booth         | OAC rule 3745-31-05(A)(3)                                    | VOC emissions shall not exceed 8.8 lbs/hr.<br><br>Particulate emissions (PE) shall not exceed 0.3 lb/hr and 1.3 tons/year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(d), 3745-17-07(A)(1) and 3745-35-07(B). |
|   | OAC rule 3745-17-07(A)(1)                                    | Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.  |
|   | OAC rule 3745-17-11(B)(1)                                    | The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).  |
|   | OAC rule 3745-21-09(U)(1)(d)                                 | The maximum coating content shall not exceed 3.5 lbs VOC per gallon, excluding water and exempt solvents for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (daily volume-weighted average).   |
|   | OAC rule 3745-35-07(B)<br>(synthetic minor to avoid Title V) | The combined total hazardous air pollutants (HAP) emissions shall not exceed 1.6 tons per rolling 12-month period for all single HAPs and 3.4 tons per rolling 12-month period for all combined HAPs from all coatings and cleanup materials used.                                  |

VOC emissions shall not exceed 38.8 tons/yr, including cleanup, per rolling 12-month period.

See Section B.1, B.2, and B.3 below.

**2. Additional Terms and Conditions**

2.a none

**B. Operational Restrictions**

1. The maximum coating content shall not exceed 3.5 lbs VOC per gallon, excluding water and exempt solvents. Note that annual coating usage is based upon the maximum amount of coating applied to emissions unit K011 in a year.
2. The maximum cleanup content shall not exceed 7.3 lbs VOC per gallon, excluding water and exempt solvents.
3. The maximum cleanup usage for emission unit K011 shall not exceed 132 gallons based upon a rolling, 12-month summation of the cleanup usage figures.

To ensure enforceability during the first 12 calendar months of operation upon start up of emission unit K011, the permittee shall not exceed the cleanup usage levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable<br/>Cumulative Cleanup Usage</u> |
|-----------------|---|
| 1               | 11  |
| 1-2             | 22  |
| 1-3             | 33  |
| 1-4             | 44  |
| 1-5             | 55  |
| 1-6             | 66  |
| 1-7             | 77  |
| 1-8             | 88  |
| 1-9             | 99  |
| 1-10            | 110   |
| 1-11            | 121   |
| 1-12            | 132   |

After the first 12 calendar months of operation upon start up of emission unit K011, compliance with the annual cleanup usage limitations shall be based upon a rolling, 12-month summation of the cleanup usage figures.

4. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for emissions unit K011:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ;
  - d. the amount of VOC emissions (c. X the number of gallons (excluding water and exempt solvents) of each coating, as applied in b);
  - e. the total number of hours the emissions unit was in operation;
  - f. the average hourly VOC emission rate for all coatings, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for emission unit K011:
  - a. the name and identification of each coating, as applied;
  - b. the VOC content for each coating in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied;
  - c. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - d. the total combined HAP content for each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
  - e. the number of gallons of each coating employed;
  - f. the name and identification of each cleanup material employed;
  - g. the VOC content for each cleanup material in pounds of VOC per gallon of cleanup material, excluding water and exempt solvents, as applied;

- h. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- i. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from h);
- j. the number of gallons of each cleanup material employed;
- k. during the first 12 calendar months of operation upon start up of emissions unit K011, the cumulative monthly cleanup material usage;
- l. beginning after the first 12 calendar months of operation upon start up of emissions unit K011; the rolling, 12-month summation of the cleanup material usage figures;
- m. the summation of VOC emissions, in tons (the sum of b times e for each coating and the sum of g times j for each cleanup material);
- n. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of c times e for each coating and the sum of h times j for each cleanup material);
- o. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times e for each coating plus the sum of i times j for each cleanup material); and
- p. the total VOC emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of b times e for each coating plus the sum of g times l for each cleanup material)

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4. The permit to install for this emissions unit (K011) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's 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 this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 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: Xylene

TLV (mg/m<sup>3</sup>): 434.19 (100 ppm)

Maximum Hourly Emission Rate (g/s): 1.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3,073.3

MAGLC (ug/m<sup>3</sup>):10,337.85

Pollutant: Ethylbenzene

TLV (mg/m<sup>3</sup>):434.19 (100 ppm)

Maximum Hourly Emission Rate (g/s): 0.3350

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 575.23

MAGLC (ug/m<sup>3</sup>):10,337.85

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

#### D. Reporting Requirements

1. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system 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 Central District Office within 30 days after the event occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following for emissions unit K011:
  - a. an identification of each hour during which the VOC emissions from emissions unit K011 exceeded 8.8 pounds per hour, and the actual VOC emissions for each such hour;
  - b. the coating VOC content limitations;
  - c. the cleanup VOC content limitations;
  - d. for the first 12 calendar months of operation following start up of emissions unit K011, all exceedances of the maximum allowable cumulative cleanup usage levels;
  - e. beginning after the first 12 calendar months of operation upon start up of emissions unit K011, the rolling, 12-month cleanup usage limitation;
  - f. the rolling, 12-month HAP and HAPs emission limitations; and
  - g. the rolling, 12-month VOC emission limitation.

These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

4. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents  
7.3 lbs VOC per gallon of cleanup material, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.1 and 2.

In accordance with OAC rule 3745-21-10(B). Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings, inks, and cleanup materials.

If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating and cleanup materials to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitation:  
VOC emissions shall not exceed 8.8 lbs/hr, excluding cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements in specified in Section C.1.

- c. Emission Limitation:  
Individual HAP, total combined HAP, and VOC emissions shall not exceed 1.6, 3.4, and 38.8 tons/yr, including cleanup, respectively, per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements in specified in Section C.2.

d. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.3 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (95\% for dry filtration system)}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

Particulate emissions (PE) shall not exceed 1.3 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

f. Emission Limitation:

The maximum annual cleanup usage shall not exceed 132 gallons based upon a rolling, 12-month summation of the coating and cleanup usage figures.

Applicable Compliance Method:

Compliance shall be demonstrated by record keeping requirements found in Section C.2 above.

**Westerman Companies**

**PTI Application: 01-08888**

**Issued: To be entered upon final issuance**

**Facility ID: 0123000234**

**Emissions Unit ID: K011**

- g. Emission Limitation:  
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**F. Miscellaneous Requirements**

None