



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: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-08190**

CERTIFIED MAIL

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

DATE: 10/12/2000

COW Industries Inc
Rusty Brill
1875 Progress Ave
Columbus, OH 43207

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, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



FINAL PERMIT TO INSTALL 01-08190

Application Number: 01-08190
APS Premise Number: 0125042315
Permit Fee: **\$800**
Name of Facility: COW Industries Inc
Person to Contact: Rusty Brill
Address: 1875 Progress Ave
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1875 Progress Ave
Columbus, Ohio**

Description of proposed emissions unit(s):
Paint line number 2.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.9

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Miscellaneous metal parts coating line #1 with spray booths vented to dry filter and curing oven. (Modification of PTI 01-6375)	OAC rule 3745-31-05	<p>Volatile organic compound emissions shall not exceed 5.6 lb/hr excluding cleanup materials and 4.1 ton/yr, including cleanup materials. See A.2.a. and A.2.b., B.1. and B.2. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(ii).</p>
	OAC rule 3745-21-09(U)(2)(ii)	Coating usage shall not exceed ten per day.

2. Additional Terms and Conditions

- 2.a This permit supercedes PTI 01-6375 issued June 19, 1996 and represents a net allowable decrease of 29.1 ton volatile organic compounds per year.
- 2.b The 5.6 lb VOC/hr limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufactures recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

B. Operational Restrictions

1. The maximum monthly cleanup usage for this emissions unit shall not exceed 30 gallons. The volatile organic content of the cleanup material shall not exceed 7.25 lb VOC per gallon.
2. The maximum annual coating usage for this emissions unit shall not exceed 1,391 gallons. The volatile organic content of employed coatings shall not exceed 5.6 lb VOC per gallon.
3. 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 the coating line:
 - a. The name and identification number of each coating employed;
 - b. The volume, in gallons, of each coating employed;
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month 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, minus the gallons of cleanup stored as a waste;
 - 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; that is, the total gallons of each coating employed times the respective VOC content plus the number of gallons of cleanup material minus the gallons stored as a waste times the VOC content of the cleanup material.

D. Reporting Requirements

2. The permittee shall notify the Central District Office 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 (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emissions Limitation:

Volatile organic compound emissions shall not exceed 5.6 pounds per hour, excluding cleanup.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum application rate (1.0 gal/hr) times the maximum coating VOC content (5.6 lb VOC/gal) equal 5.6 lb VOC/hr.

b. Emission Limitation:

Volatile organic compound emissions shall not exceed 4.1 ton per year, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon recordkeeping requirements in Section A.2.e.

$1,391 \text{ gallon coating/yr} * 5.6 \text{ lb VOC/gallon} * 1 \text{ ton/2000 pound} = 3.9 \text{ ton VOC/yr}$

$30 \text{ gal/mo} * 12 \text{ mo/yr} * 7.25 \text{ lb VOC/gal} * (1-0.85) * 1 \text{ ton/2000 lb} = 0.2 \text{ ton VOC/yr}$

c. Emission Limitation:

The permittee shall not employ more than ten gallons of coating per day.

Applicable Compliance Method:

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

d. Emission Limitation:

The volatile organic compound content shall not exceed 5.6 lb VOC /gallon of the coatings employed and 7.25 lb VOC/gallon cleanup material.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings

F. Miscellaneous Requirements

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Miscellaneous metal parts coating booth #2 vented to dry filter with exempt gas-fired curing oven. (Modification of PTI 01-6375)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound emissions shall not exceed 5.6 lb/hr excluding cleanup materials and 1.8 ton/yr, including cleanup materials. See A.2.a. and A.2.b., B.1. and B.2. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(ii).</p>
	OAC rule 3745-21-09(U)(2)(ii)	Coating usage shall not exceed ten gallons per day.

2. **Additional Terms and Conditions**

- 2.a This permit supercedes PTI 01-6375 issued June 19, 1996 and represents a net allowable decrease of 29.1 ton volatile organic compounds per year.
- 2.b The 5.6 lb VOC/hr limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufactures recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

B. Operational Restrictions

1. The maximum monthly cleanup usage for this emissions unit shall not exceed 25 gallons. The volatile organic content of the cleanup material shall not exceed 7.25 lb VOC per gallon (excluding water and exempt solvent).
2. The maximum annual coating usage for this emissions unit shall not exceed 596 gallons. The volatile organic content of employed coatings shall not exceed 5.6 lb VOC per gallon.
3. 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 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.
2. The permittee shall collect and record the following information each month 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, minus the gallons of cleanup stored as a waste;
 - 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; that is, the total gallons of each coating employed times the respective VOC content plus the number of gallons of cleanup material minus the gallons stored as a waste times the VOC content of the cleanup material.

D. Reporting Requirements

1. The permittee shall notify the Central District Office 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 (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emissions Limitation:

Volatile organic compound emissions shall not exceed 5.6 pounds per hour, excluding cleanup.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum application rate (1.0 gal/hr) times the maximum coating VOC content (5.6 lb VOC/gal) equal 5.6 lb VOC/hr.

b. Emission Limitation:

Volatile organic compound emissions shall not exceed 1.8 ton per year, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon recordkeeping requirements in Section C.2.e.

$590 \text{ gallon coating/yr} * 5.6 \text{ lb VOC/gallon} * 1 \text{ ton/2000 pound} = 1.8 \text{ ton VOC/yr}$

$25 \text{ gallon cleanup/mo} * (1 - 0.85 \text{ recovery}) * 12 \text{ mo/yr} * 7.25 \text{ lb VOC/gallon} * 1 \text{ ton/2000 pound} = 0.16 \text{ ton VOC/yr}$

c. Emission Limitation:

Coating usage shall not exceed ten gallons of coating per day.

Applicable Compliance Method:

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

d. Emission Limitation:

The volatile organic compound content shall not exceed 5.6 lb VOC /gallon of the coatings employed and 7.25 lb VOC/gallon cleanup material.

Applicable Compliance Method:

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

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the 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.

F. Miscellaneous Requirements

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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COW Industries Inc

PTI Application: 01-08190

Issued: 10/12/2000

Facility ID: 0125042315

Emissions Unit ID: K006

NEW SOURCE REVIEW FORM B

PTI Number: 01-08190

Facility ID: 0125042315

FACILITY NAME COW Industries Inc

FACILITY DESCRIPTION Paint line number 2. CITY/TWP Columbus

SIC CODE 3499 SCC CODE 4-02-025-99 EMISSIONS UNIT ID K005

EMISSIONS UNIT DESCRIPTION Miscellaneous metal parts coating line #1 with three spray booths vented to dry filter

DATE INSTALLED 5/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				5.6	3.7
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination Usage restriction of 10 gallons coating per day or less and 1,391 gallons of coating per year.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08190

Facility ID: 0125042315

FACILITY NAME COW Industries Inc

FACILITY DESCRIPTION Paint line number 2.

CITY/TWP Columbus

NEW SOURCE REVIEW FORM B

PTI Number: 01-08190

Facility ID: 0125042315

FACILITY NAME COW Industries Inc

FACILITY DESCRIPTION Paint line number 2. CITY/TWP ColumbusSIC CODE 3499 SCC CODE 4-02-025-99 EMISSIONS UNIT ID K006EMISSIONS UNIT DESCRIPTION Miscellaneous metal parts coating booth #2 vented to dry filterDATE INSTALLED 5/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				5.6	2.1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Usage of 10 gallons of coating per day or less and 590 gallons per year.IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08190

Facility ID: 0125042315

FACILITY NAME COW Industries Inc

FACILITY DESCRIPTION Paint line number 2.CITY/TWP Columbus

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electroni</u> <u>c</u>	<u>Additional information File</u> <u>Name Convention (your PTI</u> <u># plus this letter)</u>	<u>Hard</u> <u>Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

A. General Information

Central Ohio Welding (COW) proposes to install an alkaline cleaning line with exempt 2.5 MMBTU/hr gas-fired dryer and a miscellaneous metal parts coating line (K005) using either spray coating booths or electrostatic powder coating followed by an exempt 2 MMBTU/hr gas-fired curing oven. The company also proposes to install a manual batch spray paint booth with an exempt 2 MMBTU/hr gas-fired drying oven (K006). The coating line and spray booth will replace 2 spray booths (K003, K004) with a calculated emission rate of 5.9 ton VOC in 1999 as previously permitted under PTI 01-6375 issued on June 19, 1996.

B. Applicable Rules

OAC rule 3745-21-09(U)(2)(ii) - This rule limits the maximum application of coating to 10 gallon per day for the coating line and manual spray booth.

OAC rule 3745-31-05 - COW proposes to apply 1 gallon per hour at a maximum of 5.6 lb VOC/gallon resulting in a maximum hourly emission rate of 5.6 lb VOC/hr for both booths, but with an average content of 3.5 lb VOC/gallon.

For the coating line (K005), the annual emission rate is based on the application of 1,391 gallons of coating plus the use of 30 gallons of cleanup material per month.

PTI Number: 01-08190

Facility ID: 0125042315

FACILITY NAME COW Industries Inc

FACILITY DESCRIPTION Paint line number 2.

CITY/TWP Columbus

For the spray booth (K006), the annual emission rate is based on the application of 590 gallons of coating plus the use of 25 gallons of cleanup material.

C. Miscellaneous

This PTI supercedes PTI 01-6375 and would result in a decrease in the net allowable emission rate of 31.1 ton VOC/yr. The application lists an initiation of construction date of May 13, 2000. The application lists a maximum annual TLV Toxic pollutant emission rate of 0.56 ton/yr, therefore, it would not be subject to the toxic policy.

D. Fee

COW operates under SIC code of 3499. These two booths would be subject to a minimum fee of \$200 each, that would be doubled because COW has already installed the coating line and booth prior to receiving an approved Permit to Install. \$400 x 2 = \$800 fee.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

Calculations

VOC emission limit:

K005/K006 Hourly - 5.6 lb VOC/gal (maximum) * 1 gal/hr = 5.6 lb VOC/hr

K005 Annual - coating - 5.6 lb VOC/gal * 1,391 gal/yr * 1 ton/2,000 lb = 3.9 ton VOC/yr

- cleanup - 7.25 lb VOC/gal * 30 gal/mo * 12 mo/yr* (1-0.85) * 1 ton/2,000 lbs = 0.2 ton VOC/yr

VOC emission rate = 3.9 ton VOC/yr + 0.2 ton VOC/yr = 4.1ton VOC/yr

K006 Annual - coating - 6.5 lb VOC/gal * 590 gal/yr * 1 ton/2,000 lb = 1.9 ton VOC/yr

- cleanup - 7.25 lb VOC/gal * 25 gal/mo * 12 mo/yr* (1-0.85)* 1 ton/2,000 lbs = 0.16 ton VOC/yr

Total VOC emission rate = 1.65 ton VOC/yr + 0.16ton VOC/yr = 1.8 ton VOC/yr

Please complete:

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.9

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NEW SOURCE REVIEW FORM B

PTI Number: 01-08190

Facility ID: 0125042315

FACILITY NAME COW Industries Inc

FACILITY DESCRIPTION Paint line number 2.

CITY/TWP Columbus