



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: 01-08674**

CERTIFIED MAIL

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

DATE: 1/9/2003

Superior Stripping Co
Jeffrey Pisani
1301 Research Rd
Gahanna, OH 43230

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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/9/2003
Effective Date: 1/9/2003**

FINAL PERMIT TO INSTALL 01-08674

Application Number: 01-08674
APS Premise Number: 0125073000
Permit Fee: **\$800**
Name of Facility: Superior Stripping Co
Person to Contact: Jeffrey Pisani
Address: 1301 Research Rd
Gahanna, OH 43230

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1301 Research Rd
Gahanna, Ohio**

Description of proposed emissions unit(s):
Steelman 1 and 2 heat cleaning 1.

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 Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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 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 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>
PE	4.4

verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.

2. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
 - a. The secondary combustion chamber (afterburner) shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1500 degrees Fahrenheit, taking into account normal start-up procedures.
 - b. The secondary combustion chamber (afterburner) shall allow for a minimum retention time of 0.5 seconds at 1500 degrees Fahrenheit, taking into account normal start-up procedures.
3. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this heat cleaning oven and shall comply with the following:
 - a. The permittee shall ensure that the heat cleaning oven is operated only by properly trained personnel;
 - b. Prior to start-up of the heat cleaning oven, the permittee shall remove ash residue left inside the heat cleaning oven after the previous cycle;
 - c. The permittee shall not operate the heat cleaning oven if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
 - d. The permittee shall not process uncured paint or paint sludge, paint filter, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC, lead, plastisols, rubber-coated material, oil, wood, grease, trash, magnesium, oil filters, ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR Part 261, Subpart D in the heat cleaning oven. In addition, coatings that contain chlorine (PVC), fluorine (Teflon), or other elements of a corrosive nature when combusted are also prohibited from being burned in the heat cleaning oven.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
2. The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:
 - a. The dates the emissions unit was operated;

- b. The number of batches processed for each date the emissions unit was operated; and
- c. The dates and descriptions of any additional maintenance activities performed on this emissions unit.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:
 - a. The date of the excursion;
 - b. The temperature values during the excursion;
 - c. The cause(s) for the excursion; and
 - d. The corrective action which has been or will be taken to prevent similar excursions in the future.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emissions Limitation:

PE shall not exceed 0.5 lb per hour.

Applicable Compliance Method:

The hourly PE limitation was established by using the following calculations:

Maximum of 53 lbs/hour uncontrolled PE emissions
Afterburner has minimum control efficiency of 99%
 $(53 \text{ lbs PE/hour}) (1 - 0.99) = 0.5 \text{ lb PE/hour}$

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).

- b. Emissions Limitation:

PE shall not exceed 2.2 tons per year.

Applicable Compliance Method:

Compliance with the annual PE emission limitation is ensured if compliance is maintained with the hourly PE emission limitation (the annual PE emission limitation was determined by multiplying the hourly PE emission limitation and dividing by 2,000 lbs/ton).

c. Emissions Limitation:

Visible PE shall not exceed 5% opacity, except for six minutes in any 60-minute period during which opacity shall not exceed 20%.

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.

F. Miscellaneous Requirements

None

verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.

2. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
 - a. The secondary combustion chamber (afterburner) shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1500 degrees Fahrenheit, taking into account normal start-up procedures.
 - b. The secondary combustion chamber (afterburner) shall allow for a minimum retention time of 0.5 seconds at 1500 degrees Fahrenheit, taking into account normal start-up procedures.
3. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this heat cleaning oven and shall comply with the following:
 - a. The permittee shall ensure that the heat cleaning oven is operated only by properly trained personnel;
 - b. Prior to start-up of the heat cleaning oven, the permittee shall remove ash residue left inside the heat cleaning oven after the previous cycle;
 - c. The permittee shall not operate the heat cleaning oven if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
 - d. The permittee shall not process uncured paint or paint sludge, paint filter, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC, lead, plastisols, rubber-coated material, oil, wood, grease, trash, magnesium, oil filters, ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR Part 261, Subpart D in the heat cleaning oven. In addition, coatings that contain chlorine (PVC), fluorine (Teflon), or other elements of a corrosive nature when combusted are also prohibited from being burned in the heat cleaning oven.

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 - a. The dates the emissions unit was operated;

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 - a. The date of the excursion;
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- a. Emissions Limitation:

PE shall not exceed 0.5 lb per hour.

Applicable Compliance Method:

The hourly PE limitation was established by using the following calculations:

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Afterburner has minimum control efficiency of 99%
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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).

b. Emissions Limitation:

PE shall not exceed 2.2 tons per year.

Applicable Compliance Method:

Compliance with the annual PE emission limitation is ensured if compliance is maintained with the hourly PE emission limitation (the annual PE emission limitation was determined by multiplying the hourly PE emission limitation and dividing by 2,000 lbs/ton).

c. Emissions Limitation:

Visible PE shall not exceed 5% opacity, except for six minutes in any 60-minute period during which opacity shall not exceed 20%.

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.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08674

Facility ID: 0125073000

FACILITY NAME Superior Stripping Co

FACILITY DESCRIPTION Steelman 1 and 2 heat cleaning 1 CITY/TWP Gahanna

SIC CODE 3471 SCC CODE 3-09-001-99 EMISSIONS UNIT ID N001

EMISSIONS UNIT DESCRIPTION heat cleaning oven no. 1 with afterburner

DATE INSTALLED July 2001

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	attainment			0.5 lb/hour	2.2
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
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?

Use of afterburner; compliance with the permitted emission limits and applicable rules.

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 _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08674

Facility ID: 0125073000

FACILITY NAME Superior Stripping Co

FACILITY DESCRIPTION Steelman 1 and 2 heat cleaning 1 CITY/TWP Gahanna

SIC CODE 3471 SCC CODE 3-09-001-99 EMISSIONS UNIT ID N002

EMISSIONS UNIT DESCRIPTION heat cleaning oven no. 2 with afterburner

DATE INSTALLED December 2001

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	attainment			0.5 lb/hour	2.2
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
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?

Use of afterburner; compliance with the permitted emission limits and applicable rules.

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 _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____