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Facility Name: **Diamond Power Specialty Company**

Application Number: **01-7451**

Date: **October 7, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

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

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commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **Diamond Power Specialty Company** located in **Fairfield** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio</u> <u>EPA</u> <u>Source</u> <u>Number</u>	<u>Source</u> <u>Identification</u> <u>Description</u>	<u>BAT</u> <u>Determination</u>	<u>Applicable</u> <u>Federal &</u> <u>OAC Rules</u>	<u>Permit Allowable</u> <u>Mass Emissions</u> <u>and/or</u> <u>Control/Usage</u> <u>Requirements</u>
K004	Binks paint booth	Use of fabric filters during all times of paint booth operation; Compliance with air toxics policy	3745-31-05; 3745-21-09(U);	Maximum coating usage 1800 gallons per year; Maximum clean-up material usage 40 gallons per year; 9.45 pounds VOC per hour maximum emissions; 3.27 tons VOC per year maximum emissions; Maximum VOC content 3.50 pounds per gallon of coating (as applied); Maximum VOC content 6.2 pounds per gallon of clean-up material;
			3745-17-11	0.22 tons PM per year maximum emissions; 0.65 lbs PM/hr

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K004
cont'd

3745-17-07

Opacity shall not exceed 20% as a six-minute average, except as provided by rule

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	3.27
PM	0.22

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall ensure that all polyester filters are in place and operating correctly during all times of emission unit use.
2. Annual paint booth coating usage shall be limited to 1800 gallons per year.
3. Maximum coating VOC content shall be 3.50 pounds VOC per gallon.
4. Annual clean-up material usage shall not exceed 40 gallons.
5. Maximum clean-up material VOC content shall be 6.2 pounds VOC per gallon.

B. RecordKeeping Requirements

1. The permittee shall collect and record the following information each month for each booth for the purpose of determining VOC emissions:
 - a. the name and identification number of each coating and clean-up material, as applied;

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- b. the VOC content of each coating and clean-up material in pounds per gallon (excluding water and exempt solvents), as applied (see D.2.d below); and,
 - c. the number of gallons of each coating and clean-up material used.
 2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each coating and clean-up material employed;
 - b. the VOC content of each coating and clean-up material, in pounds per gallon (see D.2.d below);
 - c. the number of gallons of each coating and clean-up material employed; and,
 - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
 3. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five (5) 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 the permit. Such records may be maintained in computerized form.

C. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing an exceedance of the annual VOC limitations or gallon usage limitations. The notification shall include a copy of such record.

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2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record.
3. 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 Ohio EPA Central District Office; and,
 - 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 Ohio EPA Central District Office. 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.)

D. Compliance Determination Methods

Compliance with the emissions limitations of these terms and conditions shall be determined in accordance with the following method(s):

1. Emissions Limitations (Paint booth K004):
 - a. use of no more than 1800 gallons of coating per year;

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- b. 3.27 tons VOC per year;
- c. 9.45 pounds VOC per hour;
- d. maximum VOC content 3.50 pounds per gallon of coating, "as-applied";
- e. 0.22 ton PM per year;
- f. opacity shall not exceed 20% as a six-minute average;
- g. use of no more than 40 gallons of clean-up material per year; and,
- h. maximum VOC content 6.2 pounds per gallon of clean-up material.

2. Applicable Compliance Methods:

- a. compliance with Record keeping requirements B above. Total monthly coating usage (B.1.c) shall be added annually;
- b. compliance shall be determined through the following:
 - i. record keeping requirements (B) above;
 - ii. each coating/clean-up material VOC content shall be multiplied by the number of gallons of that coating/clean-up material used during the month. The resulting products shall be added for the monthly VOC emissions. These total monthly emissions shall be added for the year to determine annual VOC emissions.
- c. compliance with VOC coating content limitation. 9.45 lb VOC/hr represents the maximum hourly VOC emission rate. No record keeping is required. (3.5 lb VOC/gal) (2.7 gal/hr) = 9.45 lb VOC/hr;
- d. OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a)

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coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A;

- e. use of polyester filter during all periods of paint booth operation. PM emissions are determined by the following equation:

$$(SC) * (Va) * (1-TE) * (1-FE) = \text{PM emitted}$$

Where:

SC = solids content of the coating applied in pounds per gallon;

Va = volume of coating applied in gallons;

TE = transfer efficiency of painting equipment in decimal form (use 0.75);

FE = filter efficiency in decimal form (use 0.90);

PM emitted = particulate matter emitted in pounds

- f. method 9 of 40 CFR Part 60, Appendix A; OAC rule 3745-17-03(B)(1);
- g. compliance with Record keeping requirements B above. Total monthly clean-up material usage (B.1.c) shall be added annually;
- h. OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR

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