



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
MIAMI COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 08-04518

Fac ID: 0855140392

DATE: 3/29/2007

Midwest Technical Coating Inc
Thomas Bowers
101 Dye Mill Rd
Troy, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 0 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, Permit Issuance and Data Management Section at (614) 644-3631.

Sincerely,

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

CC: USEPA RAPCA MIAMI VALLEY REG PLANNING COM IN

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT MODIFICATION OF PERMIT TO INSTALL 08-04518

Application Number: 08-04518
Facility ID: 0855140392
Permit Fee: **To be entered upon final issuance**
Name of Facility: Midwest Technical Coating Inc
Person to Contact: Thomas Bowers
Address: 101 Dye Mill Rd
Troy, OH 453734285

Location of proposed air contaminant source(s) [emissions unit(s)]:

**101 Dye Mill Rd
Troy, Ohio**

Description of proposed emissions unit(s):

administrative modification to add new operation flexibility.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Midwest Technical Coating Inc

Facility ID: 0855140392

PTI Application: 08-04518

Issued: To be entered upon final issuance

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 (i.e., postmarked) quarterly 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

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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

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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

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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>
VOC	13.20

Mid

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Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

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.

(Synthetic Minor to avoid Title V)

Operations, Property, and/or Equipment	Applicable Rules/Requirements
K001- Miscellaneous metal parts paint spray booth	OAC rule 3745-31-05(A)(3)

OAC rule 3745-21-09(U)(2)(e)(i)

OAC rule 3745-35-07(B)

Mid**PTI****Issued: To be entered upon final issuance**Emissions Unit ID: **K001****Applicable Emissions
Limitations/Control Measures**

See Section 2.b.

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.22 lbs/hr, excluding cleanup and 3.32 tons/yr, including cleanup

The VOC content of the coating materials used in this emissions unit shall not exceed 6.93 pounds VOC per gallon coating.

The VOC content of the cleanup materials used in this emissions unit shall not exceed 7.25 pounds VOC per gallon.

The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(U)(2)(e)(i).

The maximum daily coating usage shall not exceed 8 gallons

The VOC emission rate from emissions units K001 and K004 combined, shall not exceed 13.20 tons/yr, including cleanup, based upon a rolling, 12-month summation of the monthly VOC emissions.

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Emissions Unit ID: **K001**

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2. Additional Terms and Conditions

2.a The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

1. The maximum annual coating usage rate for K001 shall not exceed 577 gallons based on a rolling, 12-month summation of the usage rates.
2. The maximum annual cleanup usage rate for K001 shall not exceed 365 gallons based on a rolling, 12-month summation of the usage rates.

C. Monitoring and/or Record keeping 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 each month from K001 and K004 for the purpose of determining annual VOC and HAP emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.

Midwest Technical Coating Inc**PTI****Issu****Facility ID: 0855140392****Emissions Unit ID: K001**

- d. The VOC content of each coating, as applied, in pounds per gallon.
- e. The total VOC emissions from all coatings and cleanup materials employed, in tons, i.e. the summation of $(C.1.b \times C.2.d) + (C.2.b \times C.2.c)$ for each coating and cleanup material.
- f. The rolling, 12-month summation of the monthly coating and cleanup usage, in gallons.
- g. The rolling, 12-month summation of the monthly VOC mass emissions rate, in tons.
- h. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
- i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- j. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.h.).
- k. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.i.).
- l. The total individual HAP emission from all coatings and cleanup materials employed, in tons per month, i.e, the summation of $(C.1.b \times C.2.h) + (C.2.b \times C.2.i)$ for all coating and cleanup materials.
- m. The total combined HAP emission from all coating and cleanup materials employed, in tons per month, i.e, the summation of $(C.1.b \times C.2.j) + (C.2.b \times C.2.k)$ for all coating and cleanup materials.
- n. The rolling 12- month summation, of the total individual HAP emission rate for each HAP employed at this facility.
- o. The rolling 12-month summation, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be

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Emissions Unit ID: **K001**

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obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 and K004, 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the air toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model (or other Ohio EPA approved) model, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) 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: Methyl Isobutyl Ketone

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 25.16

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1,835

MAGLC (ug/m³): 4,476

4. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of

Mid**PTI**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- 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.).

D. Reporting Requirements

1. 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 coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy

Midwest Technical Coating Inc**PTI****Issu****Facility ID: 0855140392****Emissions Unit ID: K001**

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.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month coating and cleanup usage limitation, in gallons and the actual rolling, 12-month combined coating and cleanup usage summation, in gallons, for each such month
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month individual facility HAP limitation, and the actual rolling, 12-month individual facility HAP limitation for each such month. .2.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month combined facility HAP limitation, and the actual rolling, 12-month combined facility HAP limitation for each such month
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month VOC emissions limitation, and the actual rolling, 12-month VOC emissions limitation for each such month.
6. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of noncomplying coating and cleanup materials.
7. The permittee shall submit annual reports that specify the total VOC emissions in tons, from this emissions unit for the previous calendar year. These 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.
8. These quarterly deviation (excursion) reports shall be submitted to the Director (the district office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
9. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

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):

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Emissions Unit ID: **K001**

- a. Emission Limitation-
9.22 lbs VOC/hr, excluding cleanup

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Emissions Unit ID: **K001**

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Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly coating usage times the maximum VOC content of any coating employed in this emissions unit.

- b. Emission Limitation-
3.32 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- c. Emission Limitation-
8 gallons maximum daily coating usage

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in C.1 of this permit.

- d. Emission Limitation
13.20 tons VOC/yr, including cleanup combined for K001 and K004 as a rolling 12-month summation

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in C.2 of this permit.

- e. Emission Limitation -
9.9 tons/yr of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.

- f. Emission Limitation -
24.9 tons/yr of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in

Midwest Technical Coating Inc
PTI Application 00-01510
Issu

Facility ID: 0855140392

Emissions Unit ID: K001

Section C.2. of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. The terms and conditions in this permit related to the Toxic Air Contaminant rule are not federally enforceable. .

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Emissions Unit ID: **K004**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	(Synthetic Minor to avoid Title V)
K004 - Main Auger Machine with catalytic incinerator	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-09(B)(6)	
	OAC rule 3745-35-07(B)	

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Applicable Emissions
Limitations/Control Measures

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 19.75 lbs/hr, excluding cleanup and 9.88 tons/yr, including cleanup

The VOC content of the coating materials used in this emissions unit shall not exceed 6.93 pounds VOC per gallon coating.

The VOC content of the cleanup materials used in this emissions unit shall not exceed 7.25 pounds VOC per gallon.

The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-09(B)(6).

See 2.c.

The VOC emission rate from emissions units K001 and K004 combined, shall not exceed 13.20 tons/yr, including cleanup, based upon a rolling, 12-month summation of the monthly VOC emissions.

See Section 2.b.

Mid**PTI**Emissions Unit ID: **K004****Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.
- 2.c** The use of control equipment with a capture and control efficiency of at least 81 percent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment capture and control equipment has an efficiency of not less than 90 percent, by weight, for the VOC emissions vented to the control equipment.

B. Operational Restrictions

1. The maximum annual coating usage rate for K004 shall not exceed 13,000 gallons based on a rolling, 12-month summation of the usage rates.
2. The maximum annual cleanup usage rate for K004 shall not exceed 365 gallons based on a rolling, 12-month summation of the usage rates.
3. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall install, operate, and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation.

Midwest Technical Coating Inc**PTI Application 00-01510****Issu****Facility ID: 0855140392****Emissions Unit ID: K004**

Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average temperature of the process vent stream immediately before the catalyst bed and the average temperature difference across the catalyst bed, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the process vent stream immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance;
- b. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of five years.

2. The permittee shall collect and record each month from K001 and K004 for the purpose of determining annual VOC and HAP emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The name and identification of each coating employed.
 - d. The volume, in gallons, of each coating, employed.
 - e. The VOC content of each cleanup material, in pounds per gallon.

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Emissions Unit ID: **K004**

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- f. The VOC content of each coating, as applied, in pounds per gallon.

- g. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in tons, i.e. the summation of $(C.3.b \times C.3.e) + (C.3.d \times C.3.f)$ for each coating and cleanup material.

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Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

- h. The calculated, controlled VOC emissions rate for all coatings and cleanup materials, in pounds in tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent test that demonstrated that the emissions unit was in compliance.
- i. The rolling, 12-month summation of the monthly coating and cleanup usage in gallons.
- j. The rolling, 12-month summation of the monthly VOC mass emissions rate in tons.
- k. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
- l. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- m. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.k).
- n. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.l).
- o. The total individual HAP emission from all coatings and cleanup materials employed, in tons per month i.e, the summation of $(C.3.d \times C.3.k) + (C.3.b \times C.3.l)$.
- p. The total combined HAP emission from all coating and cleanup materials employed, in tons per month i.e, the summation of $(C.3.d \times C.3.m) + (C.3.b \times C.3.n)$.
- q. The rolling 12- month summation, of the total individual HAP emission rate for each HAP employed at this facility.
- r. The rolling 12-month summation, of the total combined HAPs for all of the HAPs employed at this facility.

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*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 agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit K004 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 and K004, 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the air toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model (or other Ohio EPA approved) model, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) 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: Methyl Isobutyl Ketone

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 25.16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,835

MAGLC (ug/m3): 4,476

4. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of

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Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- 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.).

D. Reporting Requirements

1. The permittee shall submit quarterly summaries that identify all 3-hour blocks of time, when the emissions unit was in operation, during which:

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- a. the average temperature of the process vent stream immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance;
 - b. the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and/or
 - c. any records of downtime for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
2. The permittee shall submit quarterly summaries that identify any test results demonstrating that the VOC destruction efficiency of the catalyst was less than that required to maintain compliance with the total control efficiency requirements of this permit. This report shall include the date the non-compliant test results were received, the date the spent or poisoned catalyst was replaced, as well as, the hours of operation of the emissions unit between the catalyst sampling and its replacement. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month coating and cleanup usage limitation, and the actual rolling, 12-month combined coating and cleanup usage summation for each such month. .2.
 4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month individual facility HAP limitation, and the actual rolling, 12-month individual facility HAP limitation for each such month. .2.
 5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month combined facility HAP limitation, and the actual rolling, 12-month combined facility HAP limitation for each such month.
 6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month VOC emissions limitation, and the actual rolling,

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12-month VOC emissions limitation for each such month.

7. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of noncomplying coating and cleanup materials.
8. These quarterly deviation (excursion) reports shall be submitted to the Director (the district office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
9. The permittee shall submit annual reports that specify the total VOC emissions in tons, from this emissions unit for the previous calendar year. These 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.
10. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

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. Emission Limitation-
19.75 lbs VOC/hr, excluding cleanup

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum hourly coating usage times
the maximum VOC content of any coating employed by a overall capture and control efficiency of 81%.
 - b. Emission Limitation-
9.88 tons VOC/yr, including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in

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Section C.3 of this permit.

- c. Emission Limitation
13.20 tons VOC/yr, including cleanup combined for K001 and K004 as a rolling 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in C.3 of this permit.

- d. Emission Limitation -
9.9 tons/yr of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

- e. Emission Limitation -
24.9 tons/yr of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. Within 6 months after issuance of this permit, the permittee shall conduct, or have conducted, an emission test for this emissions unit in order to demonstrate compliance with the allowable mass emission rate for VOC and the overall control efficiency for VOC. The test shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A.

The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and

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procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and the use of the alternative if such approval does not contravene any other applicable requirement.

The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s).

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Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. The terms and conditions in this permit related to the Toxic Air Contaminant rule are not federally enforceable.