State of Ohio Environmental Protection Agency

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

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

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

RE: DRAFT PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL
PIKE COUNTY
Application No: 06-04754

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

DATE: 2/8/2001

Mills Pride Limited Partnership
Debra Hannah
423 Hopewell Rd
Waverly, OH 456909700

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 $600 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA SEDO

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-04754

Application Number: **06-04754**

APS Premise Number: **0666010033**

Permit Fee: **$ To be entered upon final issuance**

Name of Facility: **Mills Pride Limited Partnership**

Person to Contact: **Debra Hannah**

Address: **423 Hopewell Rd**

Waverly, OH 456909700

Location of proposed air contaminant source(s) [emissions unit(s)]:
423 Hopewell Rd
Waverly, **OHIO**

Description of modification:
Modification of PTI #06-04754 to decrease the coating usage rate add a lb/hr number and decrease the daily and annual emissions of R002, R003, and R004 issued September 25, 1996.

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

Director

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. 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 AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

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.

Mills Pride Limited Partnership Facility ID: **0666010033**
PTI Application: 06-04754
Modification Issued: To be entered upon final issuance

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **Mills Pride Limited Partnership** located in **PIKE** County. The sources 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R002	Stain roll coater/ oven	Emissions vented to a regenerative thermal oxidizer, and overall control efficiency of 90% achieved.	3745-31-05 3745-35-03 3745-21-07(G)(1)	See Additional Special Terms and Conditions.
R003	Cefla line roll coater #1/UV lamp	Emissions vented to a regenerative thermal oxidizer, and overall control efficiency of 90% achieved.	3745-31-05 3745-35-03 3745-21-07(G)(1)	See Additional Special Terms and Conditions.
R004	Cefla line roll coater #2/UV lamp	Emissions vented to a regenerative thermal oxidizer, and overall control efficiency of 90% achieved.	3745-31-05 3745-35-03 3745-21-07(G)(1)	See Additional Special Terms and Conditions.
R011	Backline finishing system	Emissions vented to a regenerative thermal oxidizer, and overall control efficiency of 90% achieved.	3745-31-05 3745-35-03 3745-21-07(G)(1)	See Additional Special Terms and Conditions.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
VOC	42.8

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

C. Tests shall be performed for the following source(s) and pollutants(s):

Source	Pollutant(s)
R002, R003, and R004	**VOC**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.**

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 **OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.**

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

1. Applicable Rules:

The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source:

3745-31-05
3745-21-07 (G) (1)
3745-21-07 (G) (6) (a)
3745-35-02

2. Allowable Mass Emission Limitations(s) and/or Control Requirements

The mass emissions from this emissions units shall not exceed the following:

A. total combined VOC emissions for emissions units R002, R003, and R004 shall not exceed 1.71 lbs/hr, 40.92 pounds per day (7.5 TPY); and,

B. VOC emissions from the Backline Finishing System (R011) shall not exceed 332.85 pounds per day (35.3 TPY).

3. Operating Limitations and Recordkeeping and Reporting Requirements

The combined stain usage for emissions units R002, R003 and R004 shall not exceed 40 gallons per day. In addition the volatile content of the stain shall not be greater than 6.67 pounds VOC per gallon of coating.

The combined Topcoats usage for emissions units R002, R003 and R004 shall not exceed 20 gallons per day. In addition the volatile content of the Topcoat shall not be greater than 0.28 pound VOC per gallon of coating.

The combined Cleanup solvent usage for emissions units R002, R003 and R004 shall not exceed 20 gallons per day. In addition, the volatile content of the Cleanup solvent shall not be greater than 6.72 pounds VOC per gallon of solvent.

The maximum annual coating usage for cleanup solvent for these emissions units shall not exceed 2,300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month	Maximum Allowable Cumulative Coating Usage
1	620
1-2	1,229
1-3	1,838
1-4	2,447
1-5	3,056
1-6	3,665
1-7	4,274
1-8	4,883
1-9	5,492
1-10	6,101
1-11	6,710
1-12	7,300

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

4. Emissions unit R011 shall also be limited to 340 gallons per day for Topcoat with Color and Catalyst, 40 gallons per day for CB251 Solvent, and 15 gallons per day of MEK (cleanup). In addition, emissions unit R011 must employ coatings with a volatile organic compound content not to exceed 5.17 pounds per gallon for Topcoat with Color and Catalyst.

A. The maximum annual coating usage (Topcoat with Color Catalyst) for this emissions unit shall not exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month	Maximum Allowable Cumulative Coating Usage
1	14,000
1-2	24,000
1-3	29,000
1-4	34,000
1-5	39,000
1-6	44,000
1-7	49,000
1-8	54,000
1-9	59,000
1-10	64,000
1-11	69,000
1-12	74,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

B. The maximum annual coating usage CB251 Solvent for this emissions unit shall not exceed 7,280 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month	Maximum Allowable Cumulative Coating Usage
1	1,500
1-2	2,500
1-3	3,000
1-4	3,500
1-5	4,000
1-6	4,500
1-7	5,000
1-8	5,500
1-9	6,000
1-10	6,500

Month	Maximum Allowable Cumulative Coating Usage
1-11	7,000
1-12	7,280

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. The maximum annual coating usage (MEK cleanup) for this emissions unit shall not exceed 3,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month	Maximum Allowable Cumulative Coating Usage
1	500
1-2	1,000
1-3	1,200
1-4	1,400
1-5	1,600
1-6	1,800
1-7	2,000
1-8	2,200
1-9	2,400
1-10	2,600
1-11	2,800
1-12	3,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. Coatings and Clean-up Material Information Recordkeeping Requirements

The permittee shall collect and record the following information each day for the coating operation:

A. the company identification for each coating and cleanup material employed;

B. documentation on whether or not each coating and cleanup material is a photochemically reactive material;

C. the number of gallons of each coating, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed;

D. the number of gallons of each coating and photochemically reactive cleanup material employed each day;

E. the organic compound content of each coating and cleanup material, in pounds per gallon;

F. the uncontrolled organic compound emission rate for each coating and cleanup material, in pounds per gallon;

G. the total uncontrolled organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds per day;

H. the total controlled organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds per day (i.e., the value from (G) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);

I. the total uncontrolled organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day;

J. the total potential uncontrolled daily organic compound emissions rate for all coatings, in pounds per day;

K. the total potential uncontrolled daily organic compound emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition 3 of this permit), in pounds per day;

L. the total uncontrolled organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day [i.e., the sum of the figures from items (I) and (K)];

M. the total controlled organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (i.e., the value from (L) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);

N. the uncontrolled organic compound emission rate for each coating and photochemically reactive cleanup material, in pounds per day;

O. the total uncontrolled organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day;

P. the total potential uncontrolled hourly organic compound emission rate for all coatings, in pounds per day;

Q. the total uncontrolled organic compound emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition 3 of this permit), in pounds per day;

R. the total uncontrolled organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (i.e., the sum of the figures from items (O) and (Q); and

S. the total controlled organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (i.e., the value from (R) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of 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 this permit. Such records may be maintained in computerized form.

This facility shall submit quarterly reports to the Ohio EPA, Southeast District Office which contains the above information. The reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June, and July through September, respectively).

6. <u>Incinerator Capture and Control Efficiency Limitations:</u>

Pursuant to OAC rule 3745-21-07(G) (6) (a), this facility shall maintain for this emissions unit a VOC capture efficiency which is at least 100% weight and a control efficiency (i.e., destruction 100% removal efficiency) which is at least 90% by weight (overall of 90%).

7. <u>Exceedance of Coating Usages:</u>

The permittee shall submit annual reports which identify any exceedances of the hourly, daily or rolling 12-month coating usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

8. The terms and conditions in this Permit to Install shall supersede the terms and conditions in the permit to install numbered 06-2425 for emissions units R002, R003 and R004. In addition the terms and conditions in permit to install numbered 06-3976 shall be superseded by this permit to install for emissions unit R011.