



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL**  
**MONTGOMERY COUNTY**  
**Application No: 08-04164**

**DATE: 7/18/00**

Innovan Inc  
Ronald Moore  
3540 Vance Rd  
Moraine, OH 45418-0000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

RAPCA



**Permit To Install  
Terms and Conditions**

**Issue Date: 7/18/00  
Effective Date: 7/18/00**

**FINAL PERMIT TO INSTALL 08-04164**

Application Number: 08-04164  
APS Premise Number: 0857103200  
Permit Fee: **\$600**  
Name of Facility: Innovan Inc  
Person to Contact: Ronald Moore  
Address: 3540 Vance Rd  
Moraine, OH 45418-0000

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

**3540 Vance Rd  
Moraine, Ohio**

Description of proposed emissions unit(s):

**2 paint booths; 1 undercoat booth.**

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

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Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**Innovan Inc**  
**PTI Application: 08-04164**  
**Issued: 7/18/00**

**Facility ID: 0857103200**

**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	24.2

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Miscellaneous Metal Parts Spray Booth #1	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).  170.4 lbs VOC/day and 20.0 TPY VOC for the K001 coating operation  0.25 TPM and 3.0 TPY VOC for the K001 solvent wiping operation  23.0 TPY VOC, including the coating and solvent wiping operations, for emissions unit K001 and K002 combined
	OAC rule 3745-21-09 (U)(1)(d)	3.5 lbs VOC/gal coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating, as employed;
  - b. the VOC content of each coating (excluding water and exempt solvents), as employed, in pounds per gallon;
  - c. the VOC content of each coating, as employed, in pounds per gallon;
  - d. the number of gallons of each coating employed;
  - e. the total volatile organic compound emission rate for all coatings employed, in pounds per day, i.e. (b X d); and,
  - f. the total volatile organic compound emission rate for all coatings employed, in pounds per day, for emissions units K001 and K002 combined [this is the summation of e for emissions units K001 and K002].
  
2. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification of each solvent wiping material employed;
  - b. the VOC content of each solvent wiping material, as employed, in pounds per gallon;
  - c. the number of gallons of each solvent wiping material employed;
  - d. the total volatile organic compound emission rate for all solvent wiping materials employed, in pounds or tons per month, i.e. (b X c);
  - e. the total volatile organic compound emission rate for all solvent wiping materials employed, in pounds or tons per month, for emissions units K001 and K002 combined [this is the summation of d for emissions units K001 and K002].
  
3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 for each pollutant emitted by this emissions unit using data from the permit to install application and

**Inno**

**PTI**

**Issued: 7/18/00**

Emissions Unit ID: **K001**

the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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: 1,2,4 - Trimethylbenzene

TLV (mg/m<sup>3</sup>): 122.89

Maximum Hourly Emission Rate (lbs/hr): 0.59

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 123.9

MAGLC (ug/m<sup>3</sup>): 1228.94

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **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 an exceedance of the daily volatile organic compound allowable emission rate for the coating operations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing an exceedance of the monthly volatile organic compound emission rate for the solvent wiping operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each 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 -  
170.4 lbs VOC/day for the K001 coating operation

**Inno**  
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**Issued: 7/18/00**

Emissions Unit ID: **K001**

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.

- b. Emission Limitation -  
20.0 TPY VOC for the K001 coating operation

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the daily VOC emission rates for the calendar year divided by 2000 lbs/ton.

- c. Emission Limitation -  
0.25 TPM VOC for the K001 solvent wiping operation
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.2. divided by 2000 lbs/ton.
- d. Emission Limitation -  
3.0 TPY VOC for the K001 solvent wiping operation
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.2. and shall be the sum of the 12 monthly VOC emission rates for the calendar year divided by 2000 lbs/ton.
- e. Emission Limitation -  
23.0 TPY VOC, including the coating and solvent wiping operations, for emissions units K001 and K002 combined
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Sections C.1. and C.2. and the following:
- i. the summation of the daily VOC emissions rates for the K001 and K002 coating operations combined (see Section C.1.f.);
  - ii. the summation of the 12 monthly VOC emissions rates for the K001 and K002 solvent wiping operations combined (see Section C.2.e.); and
  - iii. the summation of i. and ii. divided by 2000 lbs/ton.
- f. Emission Limitation -  
3.5 lbs VOC/gal ctg, excluding water and exempt solvents
- Applicable Compliance Method -  
Compliance shall be based upon the record keeping as specified in Section C.1. and USEPA Method 24 shall be used to determine the VOC contents for coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so

Emissions Unit ID: **K002**

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**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Miscellaneous Metal Parts Spray Booth #2	OAC rule 3745-31-05 (A)(3)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).</p> <p>170.4 lbs VOC/day and 20.0 TPY VOC for the K002 coating operation</p> <p>0.25 TPM and 3.0 TPY VOC for the K002 solvent wiping operation</p> <p>23.0 TPY VOC, including the coating and solvent wiping operations, for emissions unit K001 and K002 combined</p>
	OAC rule 3745-21-09 (U)(1)(d)	3.5 lbs VOC/gal coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

**Inno**

**PTI**

**Issued: 7/18/00**

Emissions Unit ID: **K002**

**2.a** None

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating, as employed;
  - b. the VOC content of each coating (excluding water and exempt solvents), as employed, in pounds per gallon;
  - c. the VOC content of each coating, as employed, in pounds per gallon;
  - d. the number of gallons of each coating employed;
  - e. the total volatile organic compound emission rate for all coatings employed, in pounds per day, i.e. (b X d); and,
  - f. the total volatile organic compound emission rate for all coatings employed, in pounds per day, for emissions units K001 and K002 combined [this is the summation of e for emissions units K001 and K002].
  
2. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification of each solvent wiping material employed;
  - b. the VOC content of each solvent wiping material, as employed, in pounds per gallon;
  - c. the number of gallons of each solvent wiping material employed;
  - d. the total volatile organic compound emission rate for all solvent wiping materials employed, in pounds or tons per month, i.e. (b X c);
  - e. the total volatile organic compound emission rate for all solvent wiping materials employed, in pounds or tons per month, for emissions units K001 and K002 combined [this is the summation of d for emissions units K001 and K002].
  
3. The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 for each pollutant emitted by this emissions unit using data from the permit to install application and

**Innovan Inc**

**PTI Application 08-04164**

**Issue**

**Facility ID: 0857103200**

Emissions Unit ID: **K002**

the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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: 1,2,4 - Trimethylbenzene

TLV (mg/m<sup>3</sup>): 122.89

Maximum Hourly Emission Rate (lbs/hr): 0.59

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 123.9

MAGLC (ug/m<sup>3</sup>): 1228.94

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **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 an exceedance of the daily volatile organic compound allowable emission rate for the coating operations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing an exceedance of the monthly volatile organic compound emission rate for the solvent wiping operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each 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 -

**Innovan Inc**  
**PTI**  
**Issue**

**Facility ID: 0857103200**

Emissions Unit ID: **K002**

170.4 lbs VOC/day for the K002 coating operation

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.

- b. Emission Limitation -  
20.0 TPY VOC for the K002 coating operation

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the daily VOC emission rates for the calendar year divided by 2000 lbs/ton.

- c. Emission Limitation -  
0.25 TPM VOC for the K002 solvent wiping operation
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.2. divided by 2000 lbs/ton.
- d. Emission Limitation -  
3.0 TPY VOC for the K002 solvent wiping operation
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.2 and shall be the sum of the 12 monthly VOC emission rates for the calendar year divided by 2000 lbs/ton.
- e. Emission Limitation -  
23.0 TPY VOC, including the coating and solvent wiping operations, for emissions units K001 and K002 combined
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Sections C.1. and C.2. and the following:
- i. the summation of the daily VOC emissions rates for the K001 and K002 coating operations combined (see Section C.1.f.);
  - ii. the summation of the 12 monthly VOC emissions rates for the K001 and K002 solvent wiping operations combined (see Section C.2.e.); and
  - iii. the summation of i. and ii. divided by 2000 lbs/ton.
- f. Emission Limitation -  
3.5 lbs VOC/gal ctg, excluding water and exempt solvents
- Applicable Compliance Method -  
Compliance shall be based upon the record keeping as specified in Section C.1. and USEPA Method 24 shall be used to determine the VOC contents for coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used 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

**Inno**  
**PTI**  
**Issued: 7/18/00**

Emissions Unit ID: **K002**

alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

None

**PART II**  
**- SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Miscellaneous Metal Parts Spray Booth #3	OAC rule 3745-31-05 (A)(3)	0.60 lbs VOC/gal coating, excluding water and exempt solvents  14.4 lbs/day and 1.14 TPY VOC  See Section A.2.a.
	OAC rule 3745-21-09 (U)(1)(d)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- 2.a** The cleanup material employed in this emissions unit is water.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the line:

- a. the name and identification number of each coating, as employed;
- b. the VOC content of each coating (excluding water and exempt solvents), as employed, in pounds per gallon;
- c. the VOC content of each coating, as employed, in pounds per gallon;
- d. the number of gallons of each coating employed; and,
- e. the total volatile organic compound emission rate for all coatings employed, in pounds per day, i.e. © X d).

#### 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 an exceedance of the daily volatile organic compound allowable emission rate for the coating operations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

#### E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
14.4 lbs VOC/day  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.
  - b. Emission Limitation -  
1.14 TPY VOC  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be

**Inno**  
**PTI**  
**Issued: 7/18/00**

Emissions Unit ID: **K003**

the sum of the daily VOC emission rates for the calendar year divided by 2000 lbs/ton.

- c. Emission Limitation -  
0.60 lbs VOC/gal ctg, excluding water and exempt solvents

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.1. and USEPA Method 24 shall be used to determine the VOC contents for coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that

**Inno**  
**PTI**  
**Issued: 7/18/00**

Emissions Unit ID: **K003**

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**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04164 Facility ID: 0857103200

FACILITY NAME Innovan Inc

FACILITY DESCRIPTION 2 paint booths; 1 undercoat booth. CITY/TWP Moraine

SIC CODE 7532 SCC CODE 4-02-025-01;4-02-025-0 EMISSIONS UNIT ID K001  
2

EMISSIONS UNIT DESCRIPTION Miscellaneous Metal Parts Spray Booth #1

DATE INSTALLED after PTI issuance

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

<u>Pollutants</u>	<u>Air Quality Description</u>	<u>Actual Emissions Rate</u>		<u>PTI Allowable</u>	
		<u>Short Term Rate</u>	<u>Tons Per Year</u>	<u>Short Term Rate</u>	<u>Tons Per Year</u>
<u>Particulate Matter</u>					
<u>PM<sub>10</sub></u>					
<u>Sulfur Dioxide</u>					
<u>Organic Compounds</u>	<u>attainment</u>	<u>170.4 lbs/day</u>	<u>23.0</u>	<u>170.4 lbs/day</u>	<u>23.0</u>
<u>Nitrogen Oxides</u>					
<u>Carbon Monoxide</u>					
<u>Lead</u>					
<u>Other: Air Toxics</u>					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination BAT is compliance with the specified OAC rules, coating lbs/gal limitation, emission limitations, record keeping and reporting requirements, and compliance with the air toxic policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Worst Case - 1,2,4 - trimethylbenzene



**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04164 Facility ID: 0857103200

FACILITY NAME Innovan Inc

FACILITY DESCRIPTION 2 naint booths: 1 undercoat booth. CITY/TWP Moraine

Emissions Unit ID: **K003**

SIC CODE 7532 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Miscellaneous Metal Parts Spray Booth #3

DATE INSTALLED after PTI issuance

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	<u>attainment</u>	<u>14.4 lbs/day</u>	<u>1.14</u>	<u>14.4 lbs/day</u>	<u>1.14</u>
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is compliance with the specified OAC rules, coating lbs/gal limitation, emission limitations, and record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

PTI Num

FACILITY

Emissions Unit ID: **K003** \_\_\_\_\_

FACILITY DESCRIPTION 2 paint booths; 1 undercoat booth. CITY/TWP Moraine

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

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

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

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

**NSR Discussion**

PTI 08-04164d is for three miscellaneous spray paint booths for Inno Van, Inc. Inno Van is a facility that specializes in the customization of step vans to include any refrigeration accessories, cabinets, counter space, etc. to fit the customers needs. This facility is a new facility establishing itself in Montgomery County which is currently in attainment for all the criteria pollutants.

Emissions Units K001 and K002 perform the majority of the coating operations for the facility and includes a quick wipe down of the truck before coating begins. Each booth is used separately, therefore, a truck is wiped down, coated with 1 application of primer and two applications of topcoat, and then released to emissions unit K003. Each booth can spray 2 applications of any material within any one hour. Although the actual spraying of the coatings takes fifteen minutes, the booths shut the doors and bake the coating while the truck is enclosed in the same booth and then reopened. Based on this information, the worst case hourly emissions for any one hour would be 1 application of primer and 1 application of topcoat. The daily allowable of 170.4 lbs for the coating operation per line was established by using this worst case hourly emission rate of 7.1 lbs/hr times 24 hours/day. The annual coating operation allowable was based on the annual production rate of 3800 trucks even though not all 3800 will probably be coated in just one booth. (Potential production for this facility is limited by the painting operations to a maximum with 3 shifts of 7665 trucks. Inno Van anticipates making 1800 vehicles/yr by the fifth year of operation of this new facility and therefore agreed to use roughly 2 times their anticipated production). These two booths also have a 3.5 lbs VOC/gal coating, excluding water and exempt solvents, limitation. The solvent wiping of the truck does occur inside the booths to minimize workers' exposure to the solvents. Therefore, the limitations were developed separately from the coating limitations but are within the same permit. The 3.0 TPY solvent wiping limitation is also based on the annual production rate of 3800 trucks. The monthly allowable was derived by dividing the annual allowable by 12 months. Each booth was given the maximum allowables to allow operational flexibility to utilize the booths as necessary. Then a combined annual allowable for K001 and K002

**3 NEW SOURCE REVIEW FORM B**

PTI Number: 08-04164

Facility ID: 0857103200

FACILITY NAME Innovan Inc

FACILITY DESCRIPTION 2 naint booths: 1 undercoat booth.

CITY/TWP Moraine

Emissions Unit ID: **K003**

was established by summing up the allowables mentioned above for the coating operation and the solvent operation.

Emissions unit K003 has the limitation 14.4 lbs/day and 1.14 TPY based again on the maximum hourly usage rate and an annual production rate of 3800 vehicles. Also included is a 0.60 lbs VOC/gal ctg, excluding water and exempt solvent, limitation.

HAPS are less than 10 tons per year on an individual basis and at a combined maximum under worst case, just under 15 TPY. See table labeled "Scenario 1\_Worst Case." A table (Scenario 2) does show a situation where the total HAPS is 21 TPY with an individual HAP over the 10 TPY, but this situation would not happen due to a physical limitation to the number of primer applications per vehicle and the actual number of vehicles that can be painted, which is 7665 vehicles per year.

Several air toxic pollutants have potential emissions over 1 TPY. By using the worst case scenario of both booths of using primer in any one hour, methyl n-amyl ketone has the highest hourly emission rate and grams per second rate. The modeled concentration was 123.9 ug/m<sup>3</sup> and still far under the lowest MAGLC of 1228.94 ug/m<sup>3</sup>.

The applicable rules are OAC rules 3745-31-05(A)(3) and 3745-21-09(U)(1)(d). BAT is compliance with the applicable OAC rules, lbs VOC/gal ctg limitation, allowable limitations, record keeping, and reporting requirements, and compliance with the air toxic policy.

The NSPS Subpart MM was also reviewed for applicability. The NSPS is specific to automobile and light-duty truck assembly plants. By our initial review of the NSPS and background information document, the regulation would not apply to InnoVan. An assembly plant is typically a conveyORIZED line that can produce 35-38 trucks per hour. Since this facility will only be making 1-2 trucks per hour the VOC emission volume is much less than that of an assembly plant described in the NSPS. Also, initial discussions with Bill Juris from OEPA also indicate that he does not feel that the NSPS should apply.

Prepared by: Maria Cruset

Date: April 27,2000

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04164

Facility ID: 0857103200

FACILITY NAME Innovan Inc

FACILITY DESCRIPTION 2 paint booths: 1 undercoat booth.

CITY/TWP Moraine

Emissions Unit ID: **K003**

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

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

**A. Source Description**

**B. Facility Emissions and Attainment Status**

**C. Source Emissions**

**D. Conclusion**

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

**NONE**

**Please complete:**

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

Pollutant  
VOC

Tons Per Year  
24.2