State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
MONTGOMERY COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 08-04194

DATE: 9/14/2000

Metokote Corporation - Plant 6
Jeremy Scoles
1340 Neubrecht Rd
Lima, OH 45414

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

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

CC: USEPA **RAPCA**

FINAL PERMIT TO INSTALL 08-04194

Application Number:	08-04194
APS Premise Number:	0857701939
Permit Fee:	**$400**
Name of Facility:	Metokote Corporation - Plant 6
Person to Contact:	Jeremy Scoles
Address:	1340 Neubrecht Rd Lima, OH 45414

Location of proposed air contaminant source(s) [emissions unit(s)]:
3435 Stop Eight Rd
Dayton, Ohio

Description of proposed emissions unit(s):
e-coat line 2 modification; chapter 31 replacing 08-4098 issued 3-15-00.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. 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).

b. 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.

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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

Pollutant	Tons Per Year
VOC	38.92

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL
TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Emissions Limitations/Control Measures
K002 - Electrocoat line #2 for metal part (Modification, see Section A.VI.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)(c) 2.3 lbs VOC/gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents; and, 2.93 tons/month VOC and 35.12 tons/year VOC
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents

2. Additional Terms and Conditions

2.a The VOC content of each coating employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 2.3 lb VOC/gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average. To ensure compliance with this

VOC content limitation, the combination of materials added to the dip tank (i.e., resin, paste, and flow control) on a monthly basis also shall meet 2.3 lb VOC/gallon of materials as a volume-weighted average, excluding water and exempt solvents.

2.b The VOC content of each coating employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank (i.e., resin, paste, and flow control) on a daily basis also shall meet 3.5 pounds of VOC/gallon of materials as a volume-weighted average, excluding water and exempt solvents.

2.c The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

1. None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the electrocoating dip tank:

   a. The name and identification number for each resin, paste, and flow control added to the tank;

   b. The number of gallons of each resin, paste, and flow control added to the tank;

   c. The VOC content of each resin, paste and flow control, in pounds per gallon, excluding water and exempt solvents; and

   d. The daily, volume-weighted average VOC content of all materials (i.e., resin, paste, and flow control) added to the dip tank,

excluding water and exempt solvents, by summing the products of (b) x (c) for all individual materials and dividing by the daily total number of gallons of all materials.

2. The permittee shall collect and record the following information each month for the electrocoating dip tank:

   a. The monthly, volume-weighted average VOC content of all materials (i.e., resin, paste, and flow control) added to the dip tank, excluding water and exempt solvents, by summing the products of 1.b. x 1.c. above, for all individual materials and dividing by the monthly total number of gallons of all materials; and,

   b. The total organic compound emission rate, in pounds per month, i.e., the sum of the products of 1.b. x 1.c. above, for each resin, paste, and flow control.

IV. Reporting Requirements

1. In accordance with paragraph B.2. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) which include the following information for this emissions unit:

   a. An identification of each month during which the monthly volume-weighted average VOC content for the combined materials exceeds 2.3 lb VOC/gallon of coating, excluding water and exempt solvents, and the actual volume-weighted average VOC content for each such month;

   b. An identification of each day during which the daily volume-weighted average VOC content for the combined materials exceeds 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, and the actual volume-weighted average VOC content for each such day; and,

c. An identification of each month during which the monthly VOC emission rate exceeds 2.93 TPM, excluding cleanup, and the actual VOC emission rate for that month.

2. 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.

V. Testing Requirements

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

a. Emission Limitation -

2.3 lb VOC/gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.2. and by calculating the volume-weighted average of all the materials added to the dip tank on a monthly basis using the following equation:

[(# gal of resin)(VOC content of resin) + (# gal of paste)(VOC content of paste) + (# gal of flow control)(VOC content of flow control)] / total # gallons of all materials for that month = monthly volume-weighted average

b. Emission Limitation -

3.5 pounds VOC/gallon of coating materials, as a daily volume-weighted average, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.1. and by calculating the volume-weighted average of all materials added to the dip tank on a daily basis using the following equation:

[(# gal of resin)(VOC content of resin) + (# gal of paste)(VOC content of paste) + (#

gal of flow control)(VOC content of flow control)] / total # of gallons of all materials for that day = daily volume-weighted average

c. Emission Limitation -

2.93 TPM VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.2. divided by 2000 lbs/ton.

d. Emission Limitation -

35.12 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.2. and shall be the sum of the twelve monthly VOC emission rates divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

For K002, this is a modification of K002 to PTI 08-04098 as issued on 03/15/00 and represents an annual increase of emissions of 12.55 TPY from 22.57 to 35.12 TPY due to a material change. For K003, this is a modification to PTI 08-03677 as issued on 10/15/97 and represents an annual decrease of emissions of 15.46 TPY from 23.82 to 8.36 TPY due to a material change. This PTI represents a total annual decrease in emission of 2.91 TPY.

B. State Only Enforceable Section

I. 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	Applicable Emissions Limitations/Control Measures
K002 - Electrocoat line #2 for metal part		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

   Pollutant: Ethylene Gycol Monohexyl Ether

TLV (ug/m3): 29,900

Maximum Hourly Emission Rate (lbs/hr): 3.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 256.5

MAGLC (ug/m3): 299.0

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.)

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. <u>prior to the change</u>, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that

identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Emissions Limitations/Control Measures
K003 - Electrocoat line #3 for metal parts (Modification, see Section A.VI.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)(c) 0.60 lbs VOC/gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents; and, 0.70 tons/month VOC and 8.36 tons/year VOC
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents

2. Additional Terms and Conditions

2.a The VOC content of each coating employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 0.60 lb VOC/gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank (i.e., resin, paste, and flow control) on a monthly basis also shall meet 0.60 lb VOC/gallon of materials as a volume-weighted average, excluding water and exempt solvents.

2.b The VOC content of each coating employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank (i.e., resin, paste, and flow control) on a daily basis also shall meet 3.5 pounds of VOC/gallon of materials as a volume-weighted average, excluding water and exempt solvents.

2.c The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the electrocoating dip tank:

   a. The name and identification number for each resin, paste, and flow control added to the tank;

   b. The number of gallons of each resin, paste, and flow control added to the tank;

   c. The VOC content of each resin, paste and flow control, in pounds per gallon, excluding water and exempt solvents; and

   d. The daily, volume-weighted average VOC content of all materials (i.e., resin, paste, and flow control) added to the dip tank, excluding water and exempt solvents, by summing the products of (b) x (c) for all individual materials and dividing by the daily total number of gallons of all materials.

2. The permittee shall collect and record the following information each month for the electrocoating dip tank:

a. The monthly, volume-weighted average VOC content of all materials (i.e., resin, paste, and flow control) added to the dip tank, excluding water and exempt solvents, by summing the products of 1.b. x 1.c. above, for all individual materials and dividing by the monthly total number of gallons of all materials; and,

b. The total organic compound emission rate, in pounds per month, i.e., the sum of the products of 1.b. x 1.c. above, for each resin, paste, and flow control.

IV. Reporting Requirements

1. In accordance with paragraph B.2. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) which include the following information for this emissions unit:

   a. An identification of each month during which the monthly volume-weighted average VOC content for the combined materials exceeds 0.60 lb VOC/gallon of coating, excluding water and exempt solvents, and the actual volume-weighted average VOC content for each such month;

   b. An identification of each day during which the daily volume-weighted average VOC content for the combined materials exceeds 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, and the actual volume-weighted average VOC content for each such day; and,

   c. An identification of each month during which the monthly VOC emission rate exceeds 0.70 TPM, excluding cleanup, and the actual VOC emission rate for that month.

2. 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.

V. Testing Requirements

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

   a. Emission Limitation -

   0.60 lb VOC/gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents

   Applicable Compliance Method -
   Compliance shall be based upon record keeping as specified in Section A.III.2. and by calculating the volume-weighted average of all the materials added to the dip tank on a monthly basis using the following equation:

   [(# gal of resin)(VOC content of resin) + (# gal of paste)(VOC content of paste) + (# gal of flow control)(VOC content of flow control)] / total # gallons of all materials for that month = monthly volume-weighted average

   b. Emission Limitation -

   3.5 pounds VOC/gallon of coating materials, as a daily volume-weighted average, excluding water and exempt solvents

   Applicable Compliance Method -
   Compliance shall be based upon record keeping as specified in Section A.III.1. and by calculating the volume-weighted average of all materials added to the dip tank on a daily basis using the following equation:

   [(# gal of resin)(VOC content of resin) + (# gal of paste)(VOC content of paste) + (# gal of flow control)(VOC content of flow control)] / total # of gallons of all materials for that day = daily volume-weighted average

   c. Emission Limitation -

   0.70 TPM VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.2. divided by 2000 lbs/ton.

d. Emission Limitation -

8.36 TPY VOC
Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.2. and shall be the sum of the twelve monthly VOC emission rates divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

For K002, this is a modification of K002 to PTI 08-04098 as issued on 03/15/00 and represents an annual increase of emissions of 12.55 TPY from 22.57 to 35.12 TPY due to a material change. For K003, this is a modification to PTI 08-03677 as issued on 10/15/97 and represents an annual decrease of emissions of 15.46 TPY from 23.82 to 8.36 TPY due to a material change. This PTI represents a total annual decrease in emission of 2.91 TPY.

B. State Only Enforceable Section

I. 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	Applicable Emissions Limitations/Control Measures
K003 - Electrocoat line #3 for metal parts		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

   Pollutant: Ethylene Gycol Monohexyl Ether

TLV (ug/m3): 29,900

Maximum Hourly Emission Rate (lbs/hr): 3.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 256.5

MAGLC (ug/m3): 299.0

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.)

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. <u>prior to the change</u>, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that

identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 08-04194 Facility ID: 0857701939

FACILITY NAME Metokote Corporation - Plant 6

FACILITY DESCRIPTION e-coat line 2 modification; chapter 31 replacing 08-4098 issued 3-15-00. CITY/TWP Dayton

SIC CODE 3479 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Electrocoat line #2 for metal part

DATE INSTALLED after modification

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	2.93 TPM	35.12	2.93 TPM	35.12
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 applicable OAC rules specified allowable emission rates through the limitation on annual coating material usage and the use of a coating material containing no more than 3.5 lbs VOC/gal, less water and exempt solvents, as a daily volume-weighted average; 2.3 lb VOC/gal, less water and exempt solvents, as a monthly volume-weighted average; record keeping and reporting requirements; and compliance with the OEPA 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: Glycol ethers, MIBK, 2-butoxyethanol, propylene glycol monomethyl ether

NEW SOURCE REVIEW FORM B

PTI Number: 08-04194 Facility ID: 0857701939

FACILITY NAME Metokote Corporation - Plant 6

FACILITY DESCRIPTION e-coat line contaminantsn: chapter 31 CITY/TWP Dayton

Emissions Unit ID: K003

SIC CODE 3479 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Electrocoat line #3 for metal parts

DATE INSTALLED after modification

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	0.70 TPM	8.36	0.70 TPM	8.36
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 applicable OAC rules specified allowable emission rates through the limitation on annual coating material usage and the use of a coating material containing no more than 3.5 lbs VOC/gal, less water and exempt solvents, as a daily volume-weighted average; 0.60 lb VOC/gal, less water and exempt solvents, as a monthly volume-weighted average; record keeping and reporting requirements; and compliance with the OEPA 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: propylene glycol monomethyl ether and propylene glycol Monohexyl ether

NEW SOURCE REVIEW FORM B

PTI Number: 08-04194 Facility ID: 0857701939

FACILITY NAME Metokote Corporation - Plant 6

FACILITY DESCRIPTION e-coat line contaminantsn: chapter 31 CITY/TWP Dayton

Emissions Unit ID: K003

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**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	0000000**c**.wpd	☐	
Modeling form/results	☐	0000000**s**.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☐
BAT Study	☐	0000000**b.**wpd	☐	☐
Other/misc.	☐	0000000**t**.wpd	☐	☐

* 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 08-04194 is to modify two coating operations K002 and K003 at Metokote Corporation - Plant 6. Metokote Corporation is contracted to apply coatings to various metal parts for the automotive industry. The facility is located in Montgomery County which is currently in attainment for ozone. This facility is currently Title V due to HAP emissions. This PTI will decrease the total VOC allowables by 2.91 TPY.

The facility is switching the coating from line 2 to line 3 and from line 3 to line 2 for both production and quality purposes. This will lead to a reduction of the amount of leaded paint that is used and increase the amount of waterbase paint. For K002 the allowables are 2.3 lbs/gal, excluding water and exempt solvents, as a monthly volume-weighted average; 3.5 lbs/gal, excluding water and exempt solvents, as a daily volume-weighted average; 2.93 TPM; and 35.12 TPY. For K003 the allowables are 0.60 lbs/gal, excluding water and exempt solvents, as a monthly volume-weighted average; 3.5 lbs/gal, excluding water and exempt solvents, as a daily volume-weighted average; 0.70 TPM; and 8.36 TPY. These allowables are potential emissions generated by the volume of paint the tanks can hold and the process rate multiplied by the maximum VOC content and an annual operating schedule of 8760 hrs/yr.

K002 does include HAP emission of 21.5 TPY combined. Both lines were evaluated for Air Toxics for all the solvents. Ethylene glycol Monohexyl ether (EGMHE) is a HAP and did not have a listed TLV therefore the TLV for 2-ethoxyethanol was used. Even with this very low TLV and MAGLC, all air toxics passed the modeling.

Applicable rules are OAC rule 3745-31-05 (A)(3) and OAC rule 3745-21-09(U)(1)(c). BAT is compliance with the applicable OAC rules specified allowable emission rates through the limitation on annual coating material usage and the use of a coating material containing no more than 3.5 lbs VOC/gal, less water and exempt solvents, as a daily volume-weighted average; 2.3 lb VOC/gal or 0.60 lb/gal, less water and exempt solvents, as a monthly volume-weighted average; record keeping and reporting requirements; and compliance with the OEPA Air Toxic Policy.

Prepared by: Maria Cruset

Date: August 29, 2000

NEW SOURCE REVIEW FORM B

PTI Number: 08-04194 Facility ID: 0857701939

FACILITY NAME Metokote Corporation - Plant 6

FACILITY DESCRIPTION e-coat line contaminantsn: chapter 31 CITY/TWP Dayton

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)

TOTcontaminants install ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	38.92