

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **08-04879**

A. Source Description

Alpine Products Manufacturing Company, Inc. coats miscellaneous metal parts for a variety of industry and military purposes. Alpine submitted a permit to install application for the installation of one new coating booth. They do not wish to increase their facility wide synthetic minor emissions limitations established in PTI 08-04807.

B. Facility Emissions and Attainment Status

Alpine is located in Montgomery County which is attainment for ozone and non-attainment for PM-2.5. The emission calculations were based on Alpine complying with OAC 3745-21-09(u)(2)(e)(i) which allows them to use 8 gallons per day per coating booth. The coating with the highest VOC content was used to demonstrate the worst case VOC emissions.

	Potential to Emit			Actual/Requested Allowable		
	VOC TPY	Ind. HAP TPY	Combined HAP TPY	VOC TPY	Ind. HAP TPY	Combined HAP TPY
K001	9.49	4.088	5.548	32.83	4.9 (MIBK)	6.65
K002	9.49	4.088	5.548			
K003	9.49	4.088	5.548			
K004	9.49	4.088	5.548			
K005	9.49	4.088	5.548			
K006	9.49	4.088	5.548			
K007	9.49	4.088	5.548			
K008	9.49	4.088	5.548			
K009	9.49	4.088	5.548			
K010	9.49	4.088	5.548			
K011	9.63	4.088	5.548			
* cleanup	10.08	0	0		0	0
L002	2.8	2.8	2.8	2.8	2.8 (TCE)	2.8
De minimis (Chrome plating)	0	0.1	0.1	0	0.1	0.1
Total:	117.41	43.78	58.38	35.63	7.8	9.55

C. Source Emissions

While potential emissions of HAP and VOC are greater than major source threshold, past usage records show facility wide actual emissions well below.

D. Conclusion

Federally enforceable emission limitations have been established to maintain Alpine's actual emissions below 9.9 TPY for any individual HAP, 24.9 for combined HAPs, and 32.83 TPY for VOCs.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 08-04879

Fac ID: 0857731991

DATE: 10/30/2007

Alpine Products
Tom Speros
2030 Drill Ave.
Dayton, OH 45414

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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

Sincerely,

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

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

KY

IN

MONTGOMERY COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04879** FOR AN AIR CONTAMINANT SOURCE
FOR **Alpine Products**

On 10/30/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Alpine Products**, located at **2030 Drill Ave, Dayton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04879:

Paint booth, exhaust system with filters, paint spray equipment.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04879

Application Number: 08-04879
Facility ID: 0857731991
Permit Fee: **To be entered upon final issuance**
Name of Facility: Alpine Products
Person to Contact: Tom Speros
Address: 2030 Drill Ave.
Dayton, OH 45414

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

**2030 Drill Ave
Dayton, Ohio**

Description of proposed emissions unit(s):

Paint booth, exhaust system with filters, paint spray equipment.

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

Chris Korleski
Director

Alpine Products

Facility ID: 0857731991

PTI Application: 08-04879

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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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.

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Alpine Products**Facility ID: 0857731991****PTI Application: 08-04879****Issued: To be entered upon final issuance**

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	32.83
Individual HAP	9.9
Combined HAP	24.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K011) - Paint Booth No. 12

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
OAC rule 3745-31-05(A)(3)(b)	The uncontrolled potential to emit for the VOC emissions for this emissions unit is less than 10 tons per year.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart M, Miscellaneous Metal Parts and Products)	<p>The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 combined shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011 and de minimis and permit exempt combined air contaminant sources shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p>

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The maximum annual combined volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup.

Emissions Unit ID: **K011**

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The annual volatile organic material usage in this term equates to the annual VOC emission rate in

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term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons of all the coatings employed.
2. The permittee shall collect and record the following information for each month for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011:
 - a. The company identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.
 - e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources :
 - a. The company identification of each coating and cleanup material employed.
 - b. The amount of each coating and cleanup material employed, in gallons.

Emissions Unit ID: **K011**

- c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.
- d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section C.3.c. above).
- e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].
- f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].
- g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.
- h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.
- i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.
- j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

* A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit K011 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 10.08

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 432

MAGLC (ug/m³): 4,486

5. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

D. Reporting Requirements

1. The permittee shall notify the director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

Emissions Unit ID: **K011**

- a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 combined).
- b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources).
- c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources).

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual reports which specify the VOC emissions, in tons, from all emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
8 gallons per day total coating usage

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

b. Emissions Limitation:

The volatile organic compound emissions rates from K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 combined shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

c. Emissions Limitation:

9.9 tons for each individual HAP per rolling, 12-month period for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources .

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

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- d. Emissions Limitation:
24.9 tons for all HAPs combined per rolling, 12-month period for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources .

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in Section C.3.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

None