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Facility Name: **Unverferth D.B.A. Kill Brothers**

Application Number: **03-3061**

Date: **January 6, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Unverferth D.B.A. Kill Brothers** located in **Van Wert** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	3745-17-07 (A)
R004 (Mod)	Paint spray booth - (Modification to allow for an increase in the mass emission rates)	Use of dry filter and compliance with the terms and conditions of this permit	3745-31-05	
			3745-21-09 (U)	
			3745-17-11 (A)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	pounds VOC/gallon			
Permit Allowable Mass Emissions and/or Control/Usage Requirements	minus water and exempt solvents	PM Emissions: UMRE<10 pounds/hour		
		No limit established.		
Coating :	20 percent opacity, as a six-minute average			
42.0 pounds OC/hour and 28.5 TPY (See Additional Special Terms and Conditions)				
Cleanup :				
680 pounds OC/month and 3.1 TPY				
3.5				

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	31.6*

* This PTI reflects an increase of 14.5 TPY over previous permit limits.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled

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maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

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AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

The purpose of this permit to correct permit limits for a paint spray booth at the Unverferth d.b.a. Kill Brothers Company located in Delphos, Ohio. The spray booth, emissions unit R004 was installed in 1976 and modified in 1982. The permittee had originally provided erroneous potential to emit (PTE) information, which formed the basis of the permit limits in the previous Permit to Install, PTI No. 03-0570. Due to a significantly higher PTE, this permit will also establish federally enforceable limits on annual OC emissions to below levels which would trigger a PSD review.

A. Applicable Emission Limitations and/or Control Requirements

1. Organic compound (OC) emissions from the application of coatings in emissions unit R004 shall be limited to 42.0 pounds per hour. Total OC emissions from the application of coatings shall not exceed 28.5 tons per year, based on a rolling, 12 month summation of the monthly input rates. This is an existing emissions unit, and for the purposes of demonstrating compliance with the first 12 months of the rolling restriction, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.
2. The permittee shall employ a dry exhaust filtration system while emissions unit R004 is in operation.

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B. Operational Restrictions

1. This permit allows for the use of the coatings and cleanup materials specified by the permittee in PTI number 03-3061. Any of the following circumstances would require prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-3061 and the operating permit:
 - a. any changes to the emissions unit or its method of operation that would require an increase in the emission limitations established by this permit; and,
 - b. any other changes which would otherwise be considered a "modification" as defined in OAC rule 3745-31-01

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month in conjunction with the application of coating materials in emissions unit R004:
 - a. the name and identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the VOC content of each coating, in pounds per gallon minus water and exempt solvents;
 - d. the number of gallons of each coating employed;
 - e. the total OC emission rate for all coatings, in pounds per month; and,
 - f. the annual emissions of OC based upon a rolling 12 month summation of the monthly input rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

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2. The permittee shall collect and record the following information each month in conjunction with the application of cleanup materials in emissions unit R004:
 - a. the name and identification for each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total OC emissions from each cleanup material in pounds per month;
 - e. the total OC emissions from all cleanup materials, in pounds per month; and,
 - f. the total cumulative OC emissions for the calendar year to date, in tons.

Note: The cleanup material information must be for the cleanup materials as employed, including any thinning solvents added at the emissions unit.

Note: The permittee may also calculate monthly OC emissions rates in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

Monthly OC emissions from cleanup operations=(total gallons of cleanup material used X solvent density)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) X solvent density.

3. 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 strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.
2. Except as otherwise provided in the condition D.1. above, 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 Ohio EPA, Northwest District Office. 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. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
4. The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
3.5 lbs VOC/gallon of coating excluding water and exempt solvents
Applicable Compliance Method

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Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of the coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

b. Emission Limitation

42.0 lbs OC/hr for the coating operation

Applicable Compliance Method

The hourly OC limits are based on the emissions unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

c. Emission Limitation

28.5 tons OC/rolling 12 month average for the coating operation

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C above.

d. Emission Limitation

680 lbs OC/month 3.1 tons OC/yr for the cleanup operations

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section C above.

e. Emission Limitation

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20 percent Opacity as a six-minute average

Applicable Compliance Method

OAC 3745-17-03(B)(1).

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation

of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. Miscellaneous Requirements

This PTI supersedes the requirements of PTI No. 03-0570 for emissions unit R004.