



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address

Lazarus Gov. Ce
P.O. Box 1
Columbus, OH 43216-1

08/27/99

CERTIFIED MAIL

02-47-08-0780
Universal Container Repair, Inc.
Fay R Rowland
P.O. Box 1007
Lorain, OH 44055

RE: Final Chapter 3745-35 Permit To Operate

Dear Fay R Rowland:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. 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

If you have any questions, please contact the Northeast District Office at (330) 425-9171.

Very truly yours,

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

cc: Northeast District Office
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 08/27/99

Facility ID: 02-47-08-0780

Expiration Date: 08/27/04

FINAL ISSUE

This document constitutes issuance for:

Universal Container Repair, Inc.
5109 Pearl Ave.
Lorain, OH 44055

of a permit to operate for:

K001 (Spray Booth - Metal Container)
Surface Coating Metal Parts

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

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 recording for continuous monitoring instrumentation, and copies of all reports required by the permit. Such record may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

: Special Terms and Conditions

Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Conveyor and two (2) paint spray booths for repaired metal racks, baskets, and containers. Coatings are air dried.	OAC rule 3745-21-09 (U)(1)(d)	3.5 pounds volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
	OAC rule 3745-35-07	See sections A.2.a, B.1, B.2 and B.3 of these terms and conditions.

2. Additional Terms and Conditions

- 2.a** The emissions from this emissions unit, including emissions from cleanup materials, shall not exceed the following limits:
- i. 15.0 tons per year of VOC, based upon a rolling, 12-month summation; and
 - ii. 5.62 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

B. Operational Restrictions

- 1. The permittee shall operate this emissions unit no more than two hundred sixty (260) days per any 12-month period.
- 2. The permittee shall not employ more than thirty (30) gallons of coatings per day in this emissions unit.
- 3. The permittee shall not employ more than eighty (80) gallons of cleanup materials per any 12-month period in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep a daily log of total coating usage for this emissions unit, in gallons per day.
- 2. The permittee shall keep the following monthly records to ensure compliance with the VOC and HAP emission limits:

Monitoring and/or Record Keeping Requirements (continued)

2.a For each coating and cleanup material used in this emissions unit:

- i. The name and identification number of each coating and cleanup material employed;
- ii. Amount of each coating used, "CT", in gallons per month;
- iii. Amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;
- iv. VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating applied (PVGC), in pounds per gallon of coating excluding water and exempt solvents, and in pounds of VOC per gallon of cleanup material used (PVGCM);
- v. For each coating, the amount of VOC emitted, in pounds per month, to be defined as "CVOC" and calculated as follows:

$$CVOC = CT * PVGC$$

- vi. For each cleanup material, the amount of VOC emitted, in pounds per month, to be defined as "CMVOC" and calculated as follows:

$$CMVOC = CM * PVGCM$$

- vii. The name of all HAPs contained in each coating and cleanup material;
- viii. Single HAP content in each coating, in units of pounds of the HAP per gallon of coating, to be defined as "PHGC";
- ix. Single HAP content in each cleanup material, in units of pounds of the HAP per gallon of cleanup material, to be defined as "PHGCM";
- x. For each single HAP in each coating, the amount of that HAP emitted in units of pounds per month, to be defined as "PUDH". "PUDH", for each single HAP, shall be calculated as follows:

$$PUDH = CT * PHGC$$

- xi. For each single HAP in each cleanup material, the amount of that HAP emitted in units of pounds per month, to be defined as "PDCM". "PDCM", for each HAP, shall be calculated as follows:

$$PDCM = CM * PHGCM$$

2.b The total amount of VOC emitted (TVOC) from this emissions unit, in tons per month, i.e., the total coating VOC (TDV) plus total cleanup material VOC (TCMVOC), divided by 2000 pounds per ton, and represented by the following equation:

$$TVOC = (TDV + TCMVOC) / (2000 \text{ lbs/ton})$$

Where

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from $i = 1$ to $i = n$, of $(CVOC)_i$, where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

and

TCMVOC = total monthly emissions of VOC from all cleanup materials employed, in pounds, calculated according to the following equation:

TCMVOC = the sum, from $i = 1$ to $i = n$, of $(CMVOC)_i$, where

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed.

Monitoring and/or Record Keeping Requirements (continued)

- 2.c For each single HAP, the total amount of that HAP emitted (TSHAP) from this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP) plus total cleanup material HAP (TPDCM), divided by 2000 pounds per ton, and represented by the following equation:

$$TSHAP = (SHAP + TPDCM) / (2000 \text{ lbs/ton})$$

where

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from $i = 1$ to $i = n$ of $(PUDH)_i$, where

$(PUDH)_i$ = total monthly emissions of a single HAP from each coating, in pounds;

i = subscript denoting an individual coating; and

n = the total number of different coatings employed that contain the HAP.

and

TPDCM = total monthly emissions for a single HAP in cleanup material, in pounds calculated according to the following equation:

TPDCM = the sum, from $i = 1$ to $i = n$, of $(PDCM)_i$, where

$(PDCM)_i$ = total monthly emissions of a single HAP from each cleanup material, in pounds;

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed that contain the HAP.

The rolling, 12-month summation of VOC emissions from emissions unit K001.

The rolling, 12-month summation of the emissions of each HAP from emissions unit K001.

3. The permittee shall keep monthly records of the total gallons of all cleanup materials employed in this emissions unit.
4. The permittee shall keep monthly records of the days of operation and the rolling, 12-month summation of the days of operation for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
- An identification of each month during which the VOC content of any coating employed exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents, and the actual VOC content of each such coating employed for each such time.
 - An identification of each day during which the coating usage in this emissions unit exceeded 30 gallons per day, and the actual coating usage for each such day.
 - All exceedances of the rolling, 12-month emission limitation for VOC.
 - All exceedances of the rolling, 12-month emission limitation for each single HAP.
 - All exceedances of the rolling, 12-month limitation on the days of operation.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the emissions of VOC and each single HAP from this emissions unit. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all cleanup materials used in this emissions unit and the total operating days of this emissions unit. The reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

3.5 pounds per gallon of VOC, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.a of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

15.0 tons per year of VOC, based upon a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.b and C.2.d of these terms and conditions.

b. Emission Limitation:

5.62 tons per year of each single HAP, based upon a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.c and C.2.e of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.