



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
CUYAHOGA COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 13-03573**

**DATE: 9/12/2000**

L Gray Barrel and Drum Company  
Kenneth Gray  
2800 East 90th Street  
Cleveland, OH 44104-3383

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  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CBAPC



**Permit To Install**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**FINAL PERMIT TO INSTALL 13-03573**

Application Number: 13-03573  
APS Premise Number: 1318006616  
Permit Fee: **\$800**  
Name of Facility: L Gray Barrel and Drum Company  
Person to Contact: Kenneth Gray  
Address: 2800 East 90th Street  
Cleveland, OH 44104-3383

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2800 East 90th Street**  
**Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Interior drum coating line and exterior drum coating line.**

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 emission limitations, operational restrictions, and control device operating parameter limitations, 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (K004)	29.34
VOC (K005)	3.03
VOC (total)	32.37

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Exterior drum coating line	OAC rule 3745-21-09(U)(1)(f)  OAC rule 3745-31-05(A)(3)	3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents  Volatile organic compound (VOC) emissions shall not exceed 6.69 lbs/hr and 29.34 tons per year (tpy) with 29.30 tpy from the coating and 0.04 tpy from cleanup materials.  Particulate emissions (PE) shall not exceed 2.41 tpy.  The requirements of this rule also include the requirements of OAC rule 3745-17-07(A) and 3745-17-11
	OAC rule 3745-17-11	0.551 lb/hr PE
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

2.a none

**II. Operational Restrictions**

none

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed, in pounds per gallon, as applied.
  - c. The VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents, as applied.
  - d. The name and identification of each cleanup material employed.
  - e. The VOC content of each cleanup material employed, in pounds per gallon as applied.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of each coating employed.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (b \* g) for all coatings + summation of (e \* f) for each cleanup material].

### IV. Reporting Requirements

The permittee shall notify the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following the end of the calendar month.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

3.5 lbs of VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the recordkeeping. The VOC content of the coatings shall be determined using USEPA Method 24 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

0.551 lbs/hr and 2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used for the paint spraying operation:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate matter emission rate (lbs/hr),  
TE = transfer efficiency, which is the ratio of the amount of coating solid deposited on the coated part to the amount of coating solids used (75% (HVLP) ), expressed as a fraction, and

CE = control efficiency of the exhaust filters (assumed to be 90%), expressed as a fraction.

If required, the permittee shall determine compliance with the above emission limit in accordance with the method in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

Emissions Unit ID: K004

20 % opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:  
Compliance with the above visible emission limitation shall be determined using USEPA Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

6.69 lbs/hr and 29.34 tpy of VOC

Applicable Compliance Method:  
Compliance with the above VOC limitations shall be determined by the following equations:

Coating:  
$$\text{VOC content (lbs/gal)} \times \text{usage (gal/hr)} = \text{hourly VOC emission rate (lbs/hr)}$$
$$\text{hourly VOC emission rate (lbs/hr)} \times \text{annual operating hours (hrs/yr)} / 2000 \text{ lbs/ton} = \text{annual}$$

VOC  
emission  
rate  
(tpy).

Cleanup:  
$$\text{usage (gal/hr)} \times \text{VOC content (lbs/gal)} \times [(100 - 95\% \text{ recovery}) / 100\%] = \text{hourly VOC}$$

emission  
rate  
(lbs/hr)

$$\text{hourly VOC emission rate (lbs/hr)} \times \text{annual operating hours (hrs/yr)} / 2000 \text{ lbs/ton} = \text{annual}$$

VOC  
emission  
rate  
(tpy)

Total:  
hourly VOC emission rate for coatings  
(lbs/hr)

+  
 hourly  
 VOC  
 emissio  
 n rate  
 for  
 cleanu  
 p  
 materia  
 ls  
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 = total  
 hourly  
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 emissio  
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 (lbs/hr)  
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annual VOC emission rate for coatings (tpy)  
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 (tpy).

**VI. Miscellaneous Requirements**

none

Issued: 9/12/2000

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Exterior drum coating line	none	none

**2. Additional Terms and Conditions**

2.a none

**II. Operational Restrictions**

none

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene  
 TLV (ug/m3): 188,405  
 Maximum Hourly Emission Rate (lbs/hr): 0.38  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34.95

MAGLC (ug/m3): 4485.83

Pollutant: VM&P Naptha

TLV (ug/m3): 1,398,773

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22.99

MAGLC (ug/m3): 33304.12

Pollutant: Xylenes

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.824

MAGLC (ug/m3): 10337.90

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (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 emission unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

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

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L Gray

PTI A<sub>1</sub>

**Issued: 9/12/2000**

Emissions Unit ID: K004

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Interior drum coating line	OAC rule 3745-21-09(U)(1)(e)  OAC rule 3745-31-05(A)(3)    OAC rule 3745-17-11  OAC rule 3745-17-07(A)(1)	4.30 pounds of VOC per gallon of coating, excluding water and exempt solvents  Volatile organic compound (VOC) emissions shall not exceed 0.69 lb/hr and 3.03 tons per year (tpy) with 3.02 tpy from the coating and 0.01 tpy from cleanup materials.  Particulate emissions (PE) shall not exceed 2.41 tpy.  The requirements of this rule also include the requirements of OAC rule 3745-17-07(A) and 3745-17-11  0.551 lb/hr PE  Visible particulate emissions from the exhaust stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed, in pounds per gallon, as applied.
  - c. The VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents, as applied.
  - d. The name and identification of each cleanup material employed.
  - e. The VOC content of each cleanup material employed, in pounds per gallon, as applied.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of each coating employed.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (b \* g) for all coatings + summation of (e \* f) for each cleanup material].

**IV. Reporting Requirements**

The permittee shall notify the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following the end of the calendar month.

**V. Testing Requirements**

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

a. Emission Limitation:

4.30 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the recordkeeping. The VOC content of the coatings shall be determined using USEPA Method 24 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

0.551 lbs/hr and 2.41 tpy of particulate emissions

**Applicable Compliance Method:**

To determine the actual worst case particulate emission rate (E), the following equation shall be used for the paint spraying operation:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate matter emission rate (lbs/hr),  
 TE = transfer efficiency, which is the ratio of the amount of coating solid deposited on the coated part to the amount of coating solids used (75% (HVLP) ), expressed as a fraction, and

CE = control efficiency of the exhaust filters (assumed to be 90%), expressed as a fraction.

If required, the permittee shall determine compliance with the above emission limit in accordance with the method in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

20 % opacity, as a 6-minute average, except as provided by rule

**Applicable Compliance Method:**

Compliance with the above visible emission limitation shall be determined using USEPA Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

0.69 lb/hr and 3.03 tpy of VOC

**Applicable Compliance Method:**

Compliance with the limitations shall be determined by the following equations:

Coating:

VOC content (lbs/gal) x usage (gal/hr) =  
hourly VOC emission rate (lbs/hr)

hourly VOC emission rate (lbs/hr) x annual  
operating hours (hrs/yr) / 2000 lbs/ton =  
annual

VOC  
emissio  
n rate  
(tpy).

Cleanup:

usage (gal/hr) x VOC content (lbs/gal) x  
[(100 - 95% recovery) / 100%] = hourly  
VOC

emissio  
n rate  
(lbs/hr)

hourly VOC emission rate (lbs/hr) x annual  
operating hours (hrs/yr) / 2000 lbs/ton =  
annual

VOC  
emissio  
n rate  
(tpy)

Total:

hourly VOC emission rate for coatings  
(lbs/hr)

+  
hourly  
VOC  
emissio  
n rate  
for  
cleanu  
p  
materia  
ls

27

L Gray

PTI A1

Issued: 9/12/2000

Emissions Unit ID: K005

(lbs/hr)  
= total  
hourly  
VOC  
emissio  
n rate  
(lbs/hr)  
.

annual VOC emission rate for coatings (tpy)  
+  
annual  
VOC  
emissio  
n rate  
for  
cleanu  
p  
materia  
ls (tpy)  
= total  
annual  
VOC  
emissio  
n rate  
(tpy).

**VI. Miscellaneous Requirements**

none

Issued: 9/12/2000

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Interior drum coating line	none	none

**2. Additional Terms and Conditions**

2.a none

**II. Operational Restrictions**

none

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 0.38

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34.95

MAGLC (ug/m3): 4485.83

Pollutant: VM&P Naptha

TLV (ug/m3): 1,398,773

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22.99

MAGLC (ug/m3): 33304.12

Pollutant: Xylenes

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.824

MAGLC (ug/m3): 10337.90

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (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 emission unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior

to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

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

**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03573 Facility ID: 1318006616

FACILITY NAME L Gray Barrel and Drum Company

FACILITY DESCRIPTION Interior drum coating line and exterior drum coating line CITY/TWP Cleveland

SIC CODE 3999 SCC CODE 3-99-999-99 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Exterior drum coating line

DATE INSTALLED 6/98

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	nonattainment	0.263 lb/hr	0.53	0.551 lb/hr	2.41
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	6.25 lbs/hr	12.5	6.69 lbs/hr	29.34
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** The BAT determination for this source is compliance with the rules and regulation and terms and conditions of this permit. The basis for the determination is knowledge of the source.

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        NOIDENTIFY THE AIR CONTAMINANTS: toluene, VM&P Naptha, xylenes

**32 NEW SOURCE REVIEW FORM B**

PTI Number: 13-03573

Facility ID: 1318006616

FACILITY NAME L Gray Barrel and Drum Company

FACILITY DESCRIPTION Interior drum coating line and exterior CITY/TWP Cleveland

Emissions Unit ID: K005

SIC CODE 3999 SCC CODE 3-99-999-99 EMISSIONS UNIT ID K005

EMISSIONS UNIT DESCRIPTION Interior drum coating line

DATE INSTALLED 6/98

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	nonattainment	0.02 lb/hr	0.04	0.551 lb/hr	2.41
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	0.5 lb/hr	1.0	0.69 lb/hr	3.03
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** The BAT determination for this source is compliance with the rules and regulation and terms and conditions of this permit. The basis for the determination is knowledge of the source.

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: toluene, VM&P Naptha, xylenes

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03573

Facility ID: 1318006616

FACILITY NAME L Gray Barrel and Drum Company

FACILITY DESCRIPTION Interior drum coating line and exterior CITY/TWP Cleveland

Emissions Unit ID: K005

**Ohio EPA Permit to Install Information Form**

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

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

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	1303573c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input checked="" type="checkbox"/>	1303573s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

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

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

NSR Discussion

NONE

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 DescriptionB. Facility Emissions and Attainment StatusC. Source EmissionsD. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (K004)	29.34
VOC (K005)	3.03
VOC (total)	32.37