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Facility Name: **Hydraulic Technologies Inc**

Application Number: **03-3135**

Date: **March 31, 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.

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### **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.

### **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<br/>EPA<br/>Source<br/>Number</u> | <u>Source<br/>Identification<br/>Number</u> | <u>BAT<br/>Determination</u> | <u>Applicable Federal<br/>&amp; OAC Rules</u> | <u>Permit Allowable Mass<br/>Emissions and/or<br/>Control/Usage<br/>Requirements</u> |
|---|---|------------------------------|---|--|
|---|---|------------------------------|---|--|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Hydraulic Technologies Inc** located in **Crawford** 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<br/>EPA<br/>Source<br/>Number</u> | <u>Source<br/>Identification<br/>Description</u>   | <u>BAT<br/>Determination</u>  | <u>Applicable<br/>Federal &amp;<br/>OAC Rules</u> | <u>Permit Allowable Mass<br/>Emissions and/or<br/>Control/Usage<br/>Requirements</u> |
|---|--|---|---|--|
|   |  |   |   | 3745-17-07<br>(A)  |
|   |  |   |   | 3745-17-11<br>(A)  |
| K004                                      | Metal Parts<br>Coating Line<br>with Curing<br>Oven | Compliance with<br>Permit Allowable<br>Emission Rate & Air<br>Toxic Policy; Use<br>of Dry Filters | 3745-31-05  |  |

3745-21-09  
(U) (1) (c)

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| Ohio<br>EPA<br>Source<br>Number   | Source<br>Identification<br>Number  | BAT<br>Determination | Applicable Federal<br>& OAC Rules | Permit Allowable Mass<br>Emissions and/or<br>Control/Usage<br>Requirements |
|---|---|----------------------|-----------------------------------|--|
|   | 0.03 tons<br>VOC/year   |                      |                                   |  |
| Permit<br>Allowable<br>Emissions<br>and/or<br>Control<br>/Usage<br>Requirements | 3.5 lbs VOC<br>per gallon of<br>coating,<br>minus water<br>and exempt<br>solvents |                      |                                   | *  |
| <u>Coating<br/>Emissions</u>  |   |                      |                                   | *  |
| 3.50<br>lbs<br>VOC/hour;<br>7.00<br>tons<br>VOC/year                            |   |                      |                                   |  |
| 0%<br>opacity<br>as a<br>six-minute<br>average                                  |   |                      |                                   |  |
| <u>Cleanup<br/>Emissions</u>  |   |                      |                                   |  |
| 5.00<br>lbs<br>VOC/mth;<br>;  |   |                      |                                   |  |

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| <u>Ohio<br/>EPA<br/>Source<br/>Number</u> | <u>Source<br/>Identification<br/>Number</u> | <u>BAT<br/>Determination</u> | <u>Applicable Federal<br/>&amp; OAC Rules</u> | <u>Permit Allowable Mass<br/>Emissions and/or<br/>Control/Usage<br/>Requirements</u> |
|---|---|------------------------------|---|--|
|---|---|------------------------------|---|--|

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- \* The limits established in accordance with OAC 3745-31-05 are more stringent than those established by 3745-17-07 and 3745-17-11.

#### SUMMARY

#### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| VOC              | 7.03             |

#### 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, Ohio 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.

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**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, Ohio 43402.**

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

#### **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.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **INTRODUCTION**

PTI #03-3135 serves to permit an existing coating line (emissions unit K004) at Hydraulic Technologies, Inc. in Galion, Ohio. The coating line, which consists of a three-stage washer, a dry-off oven, a prime paint booth, a finish paint booth, and a cure oven, will apply a primer and finish coat to steel hydraulic cylinders. Hydraulic Technologies, Inc. purchased the facility from Komatsu American International Company and is a non-major facility for Title V.

The three-stage washer and dry-off oven were not included in this permit because the combustion emissions from these units are generated in "de minimis" levels, as per OAC rule 3745-15-05.

Air toxics modeling was performed on methyl n-amyl ketone. Modeling was based on the worst-case assumption that all emissions of volatile organic compounds are methyl n-amyl ketone.

#### **A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS**

1. No additional applicable emission limitations and/or control requirements other than those listed in the Air Emissions Summary.

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**B. OPERATIONAL RESTRICTIONS**

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

Pollutant: Methly n-amyl ketone

TLV (ug/m3): 233000

Maximum Hourly Emission Rate (lbs/hr): 3.50

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 367.10

MAGLC (ug/m3): 5547.62

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent

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version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

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

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its Permit to Install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as

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defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**C. MONITORING/RECORDKEEPING REQUIREMENTS**

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied; and,
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the number of gallons of cleanup material sent off-site for disposal or reclamation, using the following equation:  
$$\text{VOC emissions from cleanup} = (\text{total gallons of cleanup solvent used} \times \text{solvent density}) - (\text{total gallons of cleanup solvent sent off-site for disposal or reclamation} [\text{minus solids content of said material}] \times \text{solvent density})$$
  - e. the number of gallons (excluding water and exempt solvents) of each coating employed; and,
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following

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information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
4. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in hard copy or computerized form.

**D. REPORTING REQUIREMENTS**

1. The permittee shall submit quarterly written reports summarizing the following:
  - a. any deviations from emission limitations and operational restrictions that have been detected by testing, monitoring, and record keeping requirements specified in this permit;
  - b. the probable cause of such deviations; and,
  - c. any corrective actions or preventive measures that have been or will be taken.

If no deviations occurred during the calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover

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the previous calendar quarters (these quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06). All reports shall be submitted to the Northwest District Office.

2. The permittee shall notify the 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 Northwest District Office within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. TESTING REQUIREMENTS**

1. Compliance with the emission limitations outlined in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation - 3.5 pounds of VOC per gallon of coating

Applicable Compliance Method - Compliance shall be based upon the record keeping requirements specified in section C.2. Formulation data or U.S. EPA Method 24 may be used to determine the VOC content of the coatings.

- b. Emission Limitation - 3.50 pounds of VOC per hour

Applicable Compliance Method - The hourly VOC emission limitation is based on the emissions unit's potential to emit\*. Therefore, no hourly record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

- \* The potential to emit for this emissions unit was based on the maximum VOC content of 3.5 pounds of

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VOC per gallon and a maximum usage rate of 1.0 gallons per hour.

- c. Emission Limitation - 7.00 tons of VOC per year

Applicable Compliance Method - The record keeping requirements in section C.2 shall be used to demonstrate compliance with the emission limitation.

- d. Emission Limitation - cleanup - 5.00 lbs VOC per month and 0.03 tons VOC per year

Applicable Compliance Method - The record keeping requirements in section C.2 shall be used to demonstrate compliance with the emissions limitation.

- e. Emission Limitation - 0% opacity as a six-minute average

Applicable Compliance Method - OAC rule 3745-17-03(B)(3).

**F. MISCELLANEOUS REQUIREMENTS**

None