State of Ohio Environmental Protection Agency

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

Street Address:
122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04551
Fac ID: 1318008441

DATE: 10/18/2005

Besten Equipment, Incorporated
Darcy Meyeer
4416 Lee Road
Cleveland, OH 44128

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA **CLAA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 10/18/2005**
Terms and Conditions	**Effective Date: 10/18/2005**

FINAL PERMIT TO INSTALL 13-04551

Application Number:	13-04551
Facility ID:	1318008441
Permit Fee:	**$800**
Name of Facility:	Besten Equipment, Incorporated
Person to Contact:	Darcy Meyeer
Address:	4416 Lee Road Cleveland, OH 44128

Location of proposed air contaminant source(s) [emissions unit(s)]:
4416 Lee Road
Cleveland, **Ohio**

Description of proposed emissions unit(s):
Synthetic minor PTI (miscellaneous metal parts MACT applicability) for boiler and metal parts spray coating line -- B001 and K001.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year

OC (coating)	14.0 (21.35 lbs/hr)
OC (cleanup material)	1.19 (6.59 lbs VOC/hr)
HAP (xylene)	9.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule3745-31-05(C) Synthetic Minor to avoid Title V and MACT
K001 - Misc. Metal Parts Coating Booth	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-09(U)(1)(c)	

Applicable Emissions Limitations/Control Measures
21.35 lbs/hr and 14.0 tons/yr of volatile organic compound (VOC) from coatings
1.19 ton/yr VOC from cleanup materials See Additional Terms and Conditions A.2.c below.
3.5 lbs VOC/gal coating, less water and exempt solvents
See Additional Terms and Conditions A.2.a and A.2.b below.

2. Additional Terms and Conditions

2.a The maximum annual coating usage for this emissions unit shall not exceed 8,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

2.b The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at this facility shall not exceed 9.9 tons/year for any individual HAP. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.c The hourly allowable emission limitation for VOC emissions from coatings has been set at the emission unit's potential to emit (PTE), therefore no record keeping or reporting is required for this limitation.

2.d The permittee requested federally enforceable limits for VOC, although the known potential to emit for VOC is estimated to be minor as of the date of issuance of PTI #13-04551.

B. Operational Restrictions

1. The permittee shall use dry filters at all times the emissions unit is in operation.

2. The maximum annual coating usage for this emissions unit shall not exceed 8,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	1,000
1-2	2,000
1-3	2,600
1-4	3,200
1-5	3,800
1-6	4,400
1-7	5,000
1-8	5,600
1-9	6,200
1-10	6,800
1-11	7,400
1-12	8,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:

a. The coating material usage for each month, in gallons;

b. The VOC content of each coating, in pounds VOC per gallon coating, as applied; and

c. Beginning after the first 12 calendar months of operation or the first 12 calendar

months following the issuance of this permit, the rolling, 12-month summation of the coating and clean-up material usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

2. The permittee shall maintain daily records of the following information:

a. The cleanup material usage for each day, in gallons; and

b. The VOC content of each cleanup material, in pounds VOC per gallon coating, as applied.

3. The permittee shall maintain monthly records of the following information:

a. The name and identification number of each HAP containing material employed;

b. The individual HAP content for each HAP, in pounds of individual HAP per pound, or gallon, of material;

c. The number of pounds, or gallons, of each HAP containing material employed;

d. The total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (c) for each material]; and

e. The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

4. The permit to install for this emissions unit was evaluated based on the actual materials (typically 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. The 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 of SCREEN 3.0 model (or other Ohio EPA approved 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):

Xylene: 9% by weight
(21.35 lbs/hr)(9%) = 1.9 lbs xylene/hr
TWA = 100 ppm
Molecular weight: 136.2
TLV (mg/m^3): = (100 ppm)(136.2)/24.45
= 557.1 mg/m^3
MAGLC: = (557.1 mg/m^3)/42 = 13.264 mg/m^3 = 13,264.0 $\mu g/m^3$

Maximum concentration = 671.4 $\mu g/m^3$ < 13,264 $\mu g/m^3$

Methyl n-amyl ketone (MAK): 24% by weight
(21.35 lbs/hr)(24%) = 5.12 lbs MAK/hr
TWA = 50 ppm
Molecular weight: 114.18
TLV (mg/m^3): = (50 ppm)(114.18)/24.45
= 233.5 mg/m^3
MAGLC: = (233.5 mg/m^3)/42 = 5.560 mg/m^3 = 5,560.0 $\mu g/m^3$

Maximum concentration = 1,809 $\mu g/m^3$ < 5,560.0 $\mu g/m^3$

Acetone: 100% by weight
(6.59 lbs/hr)(100%) = 6.59 lbs acetone/hr
TWA = 500 ppm
Molecular weight: 58.05
TLV (mg/m^3): = (500 ppm)(58.05)/24.45
= mg/m^3
MAGLC: = (233.5 mg/m^3)/42 = 5.560 mg/m^3 = 5,560.0 $\mu g/m^3$

Maximum concentration = 2,329 $\mu g/m^3$ < 5,560.0 $\mu g/m^3$

5. 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 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emissions 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 emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emission 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. This notification shall include a copy of the record and shall be sent within 30 days after the vent occurs.

3. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month.

4. The permittee shall notify the Cleveland DAQ in writing of any monthly record showing the use of coatings with a VOC content greater than 3.5 lbs VOC/gallon coating, less water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month.

E. 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. <u>Emission Limitation</u>

21.35 lbs VOC/hr (from coating)

<u>Applicable Compliance Method</u>

The hourly limit is the potential to emit based on using the coating with the highest VOC content at the maximum hourly usage rate as shown in the following calculation:

(6.1 gal/hr)(3.5 lbs VOC/gal) = 21.35 lbs VOC/hr

b. Emission Limitation

14.0 tpy VOC (from coating)

Applicable Compliance Method

Compliance shall be determined based on the record keeping requirements in section C.1.

c. Emission Limitation

1.19 tpy VOC (cleanup)

Applicable Compliance Method

Compliance shall be determined based on the record keeping requirements in section C.2.

d. Emission Limitation

3.5 lbs VOC/gal less water and exempt solvents.

Applicable Compliance Method

Compliance shall be determined based on a daily volume-weighted average of all coatings employed on each day. Compliance shall be determined based on the record keeping from Section C.1 using the formula from OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$ as follows:

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^{n} C_{VOC,2i} L_{Ci}(V_{Si} + V_{VOCi})}{\sum_{i=1}^{n} L_{Ci}(V_{Si} + V_{VOCi})}$$

where:
A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.
L_C = liquid volume of coating employed during time period t, in gallons of coating.
i = subscript denoting a specific coating employed during time period t.
n = total number of coatings employed during time period t.
t = time period specified for the weighted average VOC content.
$C_{VOC,2}$ = VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents.
V_S = volume fraction of solids (nonvolatile matter)in coating, in gallon of solids per gallon of coating.
$V_{VOC} = V_{VM} - V_W - V_{ES}$
V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.
V_W = volume fraction of water in coating, in gallon of water per gallon of coating.
V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

U.S. EPA Methods 24 shall be used to determined the VOC content for each coating. If it is demonstrated to the satisfaction of the Director that each coating formulation data is equivalent to Method 24 results, formulation data based on weight percentage of VOC components in the coating may be used. In the event of any inconsistency between a Method 24 test and the facility's formulation data, the Method 24 test will govern.

e. Emission Limitation

9.9 tons individual HAPs/year, as a 12-month rolling summation

Applicable Compliance Method

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

F. Miscellaneous Requirements

None