



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

11/23/05

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**K001 (Spray Booth) Air-less paint spraying of metal parts**

Webb-Stiles Company (16-52-00-0006)  
Larry G. Douglas  
675 Liverpool Drive  
Medina, OH 44280

Dear Larry G. Douglas:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Akron Air Pollution Control.

Sincerely,

*Michael W. Ahern*

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

REC'D. ARAQMD  
2005 NOV 28 AM 10: 21

cc: Akron Air Pollution Control



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 11/23/05

Expiration Date: 11/23/10

This document constitutes issuance to:

Facility ID: 16-52-00-0006  
Webb-Stiles Company  
675 Liverpool Drive  
Valley City, OH 44281

of a permit to operate for:

K001 (Spray Booth)  
Air-less paint spraying of metal parts

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Akron Air Pollution Control  
146 South High Street, Room 904  
Akron, OH 44308  
(330) 375-2480

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Joseph P. Koncelik".

Joseph P. Koncelik  
Director

## Part I: General Terms and Conditions

### 1. Compliance Requirements

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

### 2. Permit to Install Requirement

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

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the

Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

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

**7. Permit Transfers**

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

**8. Air Pollution Nuisance**

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

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Akron Air Pollution Control  
146 South High Street, Room 904  
Akron, OH 44308  
(330) 375-2480

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/ Requirements</u>    | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|--|--|
| K001 - spray booth, floor spray air drying line - miscellaneous metal parts coating line. | OAC rule 3745-31-05(A)(3) (PTI 16-02130) | 226.6 pounds of organic compounds (OC) per day for coatings<br><br>42.1 tons of OC per year for coatings and cleanup materials<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d). |
|   | OAC rule 3745-21-09(U)(1)(d)             | 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit   |

**2. Additional Terms and Conditions**

None

**B. Operational Restrictions**

None

**C. Monitoring and/or Record Keeping 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 each day for the purpose of determining daily OC emissions:
  - a. the name and identification of each coating employed;
  - b. the OC content of each coating, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total OC emissions from all coatings employed (i.e., the sum of (b) times (c) for each coating), in pounds per day.

**C. Monitoring and/or Record Keeping Requirements (continued)**

3. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:
  - a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total OC emissions from all coatings and cleanup materials employed (i.e, the sum of (b) times (c) for each cleanup material plus the sum of the daily emissions in section C.2.d, then divide by 2000), in tons.
4. The permit to install for this emissions unit (K001) 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 and the 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):

Pollutant: acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 0.35

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 246.3

MAGLC (ug/m3): 28,261.9

Pollutant: ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.42

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 295.6

MAGLC (ug/m3): 10,333.3

**C. Monitoring and/or Record Keeping Requirements (continued)**

Pollutant: methyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 5.3

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3729.7

MAGLC (ug/m3): 5547.6

Pollutant: stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr): 1.49

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1048.5

MAGLC (ug/m3): 12,500

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.49

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1048.5

MAGLC (ug/m3): 4476.2

**C. Monitoring and/or Record Keeping Requirements (continued)**

Pollutant: trimethylbenzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 0.23

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 161.9

MAGLC (ug/m3): 2928.6

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.77

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1245.6

MAGLC (ug/m3): 10,333.3

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 (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 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.).

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(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.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the OC emissions exceeded 226.6 pounds per day, and the actual OC emissions for each such day. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.
3. The permittee shall also submit annual reports which specify the total OC 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 limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

**1.a** Emission Limitation

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

Applicable Compliance Method

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

**1.b** Emission Limitation

226.6 pounds of OC per day for coatings

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2. Formulation data or US EPA Method 24 shall be used to determine the OC content for each coating.

**1.c** Emission Limitation

42.1 tons of OC per year for coatings and cleanup materials

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.3. Formulation data or US EPA Method 24 shall be used to determine the OC content for each coating and cleanup material.

#### **F. Miscellaneous Requirements**

**None**