☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **14-04611**

Air Clean Damper Division

A. Source Description

The Permit to Install (PTI 14-04611) covers one miscellaneous metal parts paint spray booth used to coat ventilation damper systems. The permittee has applied for a federally enforceable PTI.

B. Facility Emissions and Attainment Status

ACDD, Inc. is a major stationary source based on potential Hazardous Air Pollutants (HAPs) emissions. This facility is located in Clermont County. Clermont County is designated as attainment for PM/PM_{10}, SO_2, CO, OC and NOx for purposes of new source review. The permittee wishes to incorporate federally enforceable limitations in the PTI limiting HAP emissions to less than 10 TPY for any single HAP and less than 25 TPY for combined HAPs.

C. Source Emissions

Potential emissions were calculated based on maximum capacity and 8760 hours per year of operation. The potential emissions from this emissions unit in the absence of this federally enforceable PTI is calculated at 14.33 TPY of an individual HAP. The emissions limitations outlined in this PTI limit HAP emissions to less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs. The permittee will record coating usages and submit reports as described in the PTI's terms and conditions to ensure compliance with the emissions limitations.

D. Conclusion

The terms and conditions in this PTI limit the permittee's potential HAP emissions to less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs. The permittee will maintain coating usage records and submit reports as outlined in the terms and conditions for all emissions units to demonstrate compliance with the emission limitations. Because the potential HAP emissions are less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs, the permittee will not be subject to the requirements of Title V permitting or MACT.

State of Ohio Environmental Protection Agency

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

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
CLERMONT COUNTY
Application No: 14-04611
DATE: 4/26/2001

Air Clean Damper Division
Mark Rosselot
1262 State Route 50
Milford, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 100** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: **USEPA** **KY** **IN** **HCDES** **Ohio-Kentucky-Indiana Reg Council of Govt**

DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04611

Application Number:	14-04611
APS Premise Number:	1413080442
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Air Clean Damper Division
Person to Contact:	Mark Rosselot
Address:	1262 State Route 50 Milford, OH 45150

Location of proposed air contaminant source(s) [emissions unit(s)]:
1262 State Route 50
Milford, **Ohio**

Description of proposed emissions unit(s):
One miscellaneous metal parts paint spray booth (modification to PTI 14-4611 issued on May 12, 1999).

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
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 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.)

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

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..

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
VOC	10.44

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	Applicable Emissions Limitations/Control Measures
K001 - Miscellaneous metal parts paint spray booth (modification)	OAC rule 3745-31-05(A)(3)	57.2 lbs VOC/day 10.44 TPY VOC The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D). See term A.2.d. and B.2.
	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and MACT	See term A.2.a.
	OAC rule 3745-21-09(U)(2)(f)	See terms A.2.c. and B.1.

2. Additional Terms and Conditions

2.a The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used

since all HAP(s) used evaporated.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material VOC content limitations and coating and cleanup material usage limitations and compliance with the air toxics policy.

2.c The permittee shall not employ coatings in emissions unit K001 with a VOC content greater than 6.7 pounds per gallon, including water and exempt solvents, as applied.

2.d The permittee shall not employ cleanup materials in emissions unit K001 with a VOC content greater than 6.7 pounds of VOC per gallon, as applied.

B. Operational Restrictions

1. The maximum coating usage for emissions unit K001 shall not exceed 6.54 gallons per day and 2385 gallons per year, including water and exempt solvents.

2. The maximum cleanup material usage for emissions unit K001 shall not exceed 2 gallons per day and 730 gallons per year.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:

   a. The name and identification number of each coating, employed.

   b. The individual HAP* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

   c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].

   d. The number of gallons of each coating employed.

   e. The name and identification of each cleanup material employed.

   f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

   g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].

h. The number of gallons of each cleanup material employed.

i. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].

j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calender months.

l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calender months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

2. The permittee shall collect and record the following information each day for emissions unit K001:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The VOC content of each coating, in pounds per gallon, as applied, including water and exempt solvents.

d. The name and identification of each cleanup material employed.

e. The volume, in gallons, of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total organic compound emission rate for all coatings and cleanup materials employed, in pounds per day [(b x c) + (e x f)].

3. 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 Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: 2-butoxyethanol
   TLV (ug/m3): 121,000
   Maximum Hourly Emission Rate (lbs/hr): 5.6
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1517
   MAGLC (ug/m3): 2881

   Pollutant: toluene
   TLV (ug/m3): 188,000
   Maximum Hourly Emission Rate (lbs/hr): 5.6
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1517
   MAGLC (ug/m3): 4476

   Pollutant: xylene
   TLV (ug/m3): 434,000
   Maximum Hourly Emission Rate (lbs/hr): 3.27
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 834
   MAGLC (ug/m3): 10,333

   Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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 with 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 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the 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 deviation reports which include the following information for emissions unit K001:

   An identification of each day during which the daily or annual coating and/or cleanup material usage limitation or emission limitation was exceeded and the actual usage or emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings and/or cleanup materials. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

3. The permittee shall submit annual reports which specify the total VOC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 30 of each year.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.a. The permittee shall submit

annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K001. If, pursuant to section 4.3 of Method 24,40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with daily VOC emission limit and the daily coating and cleanup material usage limit shall be determined by the recordkeeping requirements in term C.2. of this permit.

3. Compliance with the HAP limitation shall be determined by the recordkeeping requirements in term C.1 of this permit.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.2., D and E.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611 Facility ID: 1413080442

FACILITY NAME Air Clean Damper Division

FACILITY DESCRIPTION One miscellaneous metal parts paint spray booth. CITY/TWP Milford

SIC CODE 3444 SCC CODE 40200110 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Miscellaneous metal parts paint spray booth modification

DATE INSTALLED August 1989

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					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	25.5 lbs/day	3.28	57.2 lbs/day	10.44
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?
Coating and cleanup material VOC content limitations and coating and cleanup material usage limitations. Compliance with air toxics policy.

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 contaiminants 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: 2-Butoxyethanol, Toluene, Xylene

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611 Facility ID: 1413080442

FACILITY NAME Air Clean Damper Division

FACILITY DESCRIPTION One miscellaneous metal parts paint spray booth. CITY/TWP Milford

ADMINISTRATIVE MODIFICATION
inter-office communication

to: DAPC, Air Quality Modeling and Planning

from: Tom Wittekind, HCDOES

subject: Administrative Modification of Permit to Install

date: 02/15/01

Choose one:

Initiated by: ___X_ Permittee _____ DO/LAA

___ This modification is the result of an appeal to the Environmental Review Appeals Commission.

Please fill out the following:

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

Pollutant	Tons Per Year
VOC	10.44

Please provide a fairly detailed description of the basis for the modification and how the permit is being modified:

Air Clean Damper Company (ACDC) was bought by Mestek, Inc. and is now know as Air Clean Damper Division (ACDD). ACDD submitted their annual report and this report indicated they have been using coatings and cleanup materials with VOC contents greater than the allowables (5.6 lbs/gallon for coatings and 6.2 lbs/gallon for cleanup materials) in their PTI. An NOV was sent to ACDD and as part of their compliance plan ACDD has requested an increase in their allowable VOC content of coatings and cleanup materials to 6.7 lbs/gallon each. Some of their products are exposed to harsh conditions and the coating must withstand these conditions. ACDD has agreed to a daily and annual usage limit decrease in order to stay within the current emissions limitations. The daily coating usage limitation will drop to 6.54 gallons per day and the annual coating usage limit will drop to 2385 gallons per year. Cleanup material usage will not change. Therefore the daily VOC emissions limit remains at 57.2 lbs of VOC per day and the annual limit remains at 10.44 TPY VOC.

Modification fee = ½ ($200) = $100

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611 Facility ID: 1413080442

FACILITY NAME	Air Clean Damper Division		
FACILITY DESCRIPTION	One miscellaneous metal parts paint spray booth.	CITY/TWP	Milford

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611 Facility ID: 1413080442

FACILITY NAME Air Clean Damper Division

FACILITY DESCRIPTION	One miscellaneous metal parts paint spray booth.	CITY/TWP	Milford

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**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000**c**.wpd	☒	
Modeling form/results	☐	0000000**s**.wpd	☐	☒
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b.**wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* 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

12398.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611	Facility ID: 1413080442		
FACILITY NAME	Air Clean Damper Division		
FACILITY DESCRIPTION	One miscellaneous metal parts paint spray booth.	CITY/TWP	Milford

ACDC, Inc.
1262 State Route 50, P.O. Box 230
Milford, Ohio 45150

PN: 1413080442

AC/DC, Inc. manufactures and paints ventilation damper systems. This permit application is for a modification to one existing miscellaneous metal parts paint spray booth. Since the damper systems can be exposed to temperatures in excess of 250 degrees, compliant coatings are not available that can withstand these temperatures. AC/DC, Inc. will comply with a 6.5 gallons per day limit.

The applicable Ohio Administrative Code (OAC) regulations are 3745-31-05, 3745-15-07 and 3745-21-09(U)(2)(f).

VOC emissions are calculated to be 10.44 TPY. The coatings used in this booth contain Hazardous Air Pollutants (HAPs). Potential facility HAP emissions have been calculated at 14.33 TPY for an individual HAP. This PTI will be a synthetic minor PTI with respect to HAP emissions and will limit the facility total HAP emissions to less than 10 TPY of any single HAP and to less than 25 TPY for any combined HAPs.

Best Available Technology (BAT) for this booth is a VOC content limitation for coatings and cleanup materials, usage limitations and compliance with air toxics policy.

This emissions unit is in compliance with the above OAC rules, with the exception of installing the booths without first obtaining a permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611 Facility ID: 1413080442

FACILITY NAME Air Clean Damper Division

FACILITY DESCRIPTION	One miscellaneous metal parts paint spray booth.	CITY/TWP	Milford

Permit fee: K001 (modification)= $200/2 = $100

Thomas P. Wittekind
February 15, 2001

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 Description

The Permit to Install (PTI 14-4611) covers one miscellaneous metal parts paint spray booth used to coat ventilation damper systems. The permittee has applied for a federally enforceable PTI.

B. Facility Emissions and Attainment Status

ACDD, Inc. is a major stationary source based on potential Hazardous Air Pollutants (HAPs) emissions. This facility is located in Clermont County. Clermont County is designated as attainment for PM/PM_{10}, SO_2, CO, OC and NOx for purposes of new source review. The permittee wishes to incorporate federally enforceable limitations in the PTI limiting HAP emissions to less than 10 TPY for any single HAP and less than 25 TPY for combined HAPs.

C. Source Emissions

Potential emissions were calculated based on maximum capacity and 8760 hours per year of operation. The potential emissions from this emissions unit in the absence of this federally enforceable PTI is calculated at 14.33 TPY of an individual HAP. The emissions limitations outlined in this PTI limit HAP emissions to less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs. The permittee will record coating usages and submit reports as described in the PTI's terms and conditions to ensure compliance with the emissions limitations.

D. Conclusion

The terms and conditions in this PTI limit the permittee's potential HAP emissions to less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs. The permittee will maintain coating usage records and submit reports as outlined in the terms and conditions for all emissions units to demonstrate compliance with the emission limitations. Because the potential HAP emissions are less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs, the permittee will not be subject to the requirements of Title V permitting or MACT.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

NEW SOURCE REVIEW FORM B

PTI Number: 14-04611 Facility ID: 1413080442

FACILITY NAME Air Clean Damper Division

FACILITY DESCRIPTION	One miscellaneous metal parts paint spray booth.	CITY/TWP	Milford

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	10.44

NEW SC

PTI Num

FACILIT

Emissions Unit ID: **K001**

FACILITY DESCRIPTION	One miscellaneous metal parts paint spray booth.	CITY/TWP	Milford