

Facility ID: 0857732098 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0857732098 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

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>
Gear Box Paint Booth	OAC rule 3745-31-05 See F.2. OAC rule 3745-21-09(U)(1)(c) See F.2.	17.5 lbs/hour, 1.22 tons/month, 14.68 tons/year volatile organic compounds (VOC), including cleanup; 3.5 lbs VOC/gallon minus water

2. Additional Terms and Conditions

- (a) The 17.5 lbs/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum coating usage rates shall not exceed 5 gallons/hour, 583.33 gallons/month, and 7000 gallons/year.
2. The maximum cleanup material usage rates shall not exceed 60 gallons/month and 720 gallons/year.

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.
 - 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 month 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 (excluding water and exempt solvents) of each coating employed.
 - e. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

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 also submit annual reports which specify the total organic compound 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 in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 Emission Limitation -
 17.5 lbs/hour VOC

 Applicable Compliance Method -
 Compliance shall be determined by multiplying the maximum hourly coating usage of 5 gallons by the maximum VOC content of 3.5 lbs/gallon.
 Emissions Limitation -
 1.22 tons/month VOC

 Applicable Compliance Method -
 Compliance shall be based upon record keeping as specified in (C)(2).
 Emissions Limitation -
 14.68 tons/year VOC (including cleanup)

 Applicable Compliance Method -
 Compliance shall be based upon record keeping as specified in (C)(2) and shall be the sum of the monthly VOC emission rates for the calendar year.
2. USEPA Method 24 shall be used to determine the VOC contents for 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.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 08-3464, as issued on March 20, 1996: A.1, B, C, and D.

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

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>
J-Line Paint Booth	OAC rule 3745-31-05 See F.2. OAC rule 3745-21-09(U)(1)(c) See F.2.	17.5 lbs/hour, 1.22 tons/month, 14.68 tons/year volatile organic compounds (VOC), including cleanup; 3.5 lbs VOC/gallon minus water

2. Additional Terms and Conditions

- (a) The 17.5 lbs/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum coating usage rates shall not exceed 5 gallons/hour, 583.33 gallons/month, and 7000 gallons/year.
2. The maximum cleanup material usage rates shall not exceed 60 gallons/month and 720 gallons/year.

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.
 - 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 month 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 (excluding water and exempt solvents) of each coating employed.
 - e. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

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 also submit annual reports which specify the total organic compound 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 in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation -
17.5 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly coating usage of 5 gallons by the maximum VOC content of 3.5 lbs/gallon.

Emissions Limitation -
1.22 tons/month VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in (C)(2).

Emissions Limitation -
14.68 tons/year VOC (including cleanup)

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in (C)(2) and shall be the sum of the monthly VOC emission rates for the calendar year.
2. USEPA Method 24 shall be used to determine the VOC contents for 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.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 08-3464, as issued on March 20, 1996: A.1, B, C, and D.

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

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>
Burning Table #1	OAC rule 3745-31-05 See F.2.	0.16 lb/hour, 3.82 lbs/day, and 0.70 ton/year particulate emissions; 5% visible emissions opacity, as a 3-minute average
	OAC rule 3745-17-07(A) See F.2.	Less stringent than the above opacity limit.
	OAC rule 3745-17-11(B)(1) See F.2	Less stringent than the above particulate limits.

2. **Additional Terms and Conditions**

(a) The 0.16 lbs of particulate/hour limit was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. This emissions unit shall be controlled through the application of continuous wet suppression.
2. Th maximum amount of steel plate cut shall be 31,800 inches per day.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for the burning table:
 - a. Amount of steel plate cut, in inches.
 - b. A log of downtime for the wet suppression control system when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with paragraph 3 of the General Terms and Conditions, which identify each day the daily cutting limit was exceeded, as well as the corrective actions that were taken to achieve compliance.

E. Testing Requirements

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

Emissions Limitation -
0.16 lb/hour particulate emissions

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly production rate (1325 inches of plate cut/hour) by an emission factor of 0.0012 lb particulate/inch of plate cut from USEPA 313 Guidance Document for the Metal Fabrication Industry. The resulting uncontrolled emission rate, 1.59 lbs/hour, is then multiplied by a water curtain control factor of 90 percent (1 - 0.90). If required, compliance shall be based upon stack testing per OAC rule 3745-17-03(B)(10).

Emissions Limitation -
3.82 lbs/day particulate emissions

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum daily production rate (31,800 inches of plate cut/day) by an emission factor of 0.0012 lb particulate/inch of plate cut from USEPA 313 Guidance Document for the Metal Fabrication Industry. The resulting uncontrolled emission rate, 38.16 lbs/hour, is then multiplied by a water curtain control factor of 90 percent (1 - 0.90).

Emissions Limitation -
0.70 ton/year particulate emissions

Applicable Compliance Method -
The annual mass emission limitation of 0.70 TPY was developed by multiplying the hourly emission rate of 0.16 lb/hour by the maximum operating schedule of 8760 hours/year and dividing by 2,000 lbs/ton.

Emissions Limitation -
5% visible emissions opacity, as a 3-minute average

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 08-3242, as issued on April 26, 1995: A.1, B, C, and D.

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

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>
Burning Table #2	OAC rule 3745-31-05 See F.2.	0.16 lb/hour, 3.82 lbs/day, and 0.70 ton/year particulate emissions;
	OAC rule 3745-17-07(A) See F.2.	5% visible emissions opacity, as a 3-minute average
	OAC rule 3745-17-11(B)(1) See F.2.	Less stringent than the above opacity limit. Less stringent than the above particulate limits.

2. **Additional Terms and Conditions**
 - (a) The 0.16 lbs of particulate/hour limit was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. This emissions unit shall be controlled through the application of continuous wet suppression.
2. Th maximum amount of steel plate cut shall be 31,800 inches per day.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for the burning table:
 - a. Amount of steel plate cut, in inches.
 - b. A log of downtime for the wet suppression control system when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with paragraph 3 of the General Terms and Conditions, which identify each day the daily cutting limit was exceeded, as well as the corrective actions that were taken to achieve compliance.

E. Testing Requirements

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

Emissions Limitation -
0.16 lb/hour particulate emissions

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly production rate (1325 inches of plate cut/hour) by an emission factor of 0.0012 lb particulate/inch of plate cut from USEPA 313 Guidance Document for the Metal Fabrication Industry. The resulting uncontrolled emission rate, 1.59 lbs/hour, is then multiplied by a water curtain control factor of 90 percent (1 - 0.90). If required, compliance shall be based upon stack testing per OAC rule 3745-17-03(B)(10).

Emissions Limitation -
3.82 lbs/day particulate emissions

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum daily production rate (31,800 inches of plate cut/day) by an emission factor of 0.0012 lb particulate/inch of plate cut from USEPA 313 Guidance Document for the Metal Fabrication Industry. The resulting uncontrolled emission rate, 38.16 lbs/hour, is then multiplied by a water curtain control factor of 90 percent (1 - 0.90).

Emissions Limitation -
0.70 ton/year particulate emissions

Applicable Compliance Method -
The annual mass emission limitation of 0.70 TPY was developed by multiplying the hourly emission rate of 0.16 lb/hour by the maximum operating schedule of 8760 hours/year and dividing by 2,000 lbs/ton.
Emissions Limitation -
5% visible emissions opacity, as a 3-minute average

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 08-3242, as issued on April 26, 1995: A.1, B, C, and D.

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

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>
17 Welders (11-MIG, 5-TIG,1-Sub-Arc)	OAC rule 3745-31-05 See F.2.	0.09 lb/hour, 2.16 lbs/day, and 0.39 ton/year particulate emissions from each welder;
	OAC rule 3745-17-07(A) See F.2.	5% visible emissions opacity, as a 3-minute average
	OAC rule 3745-17-11(B)(1) See F.2.	Less stringent than the above opacity limit. Less stringent than the above particulate limits.

2. Additional Terms and Conditions

- (a) The 0.09 lb/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum welding wire usage rate for each welder shall not exceed 2.5 lbs/hour, 60 lbs/day, and 21,900 lbs/year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of welding wire usage for each welder, in lbs.

D. Reporting Requirements

1. The permittee shall submit annual deviation reports which identify any exceedances of the annual welding wire usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emissions Limitation -

0.09 lb/hour particulate emissions

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly welding wire usage rate (2.5 lbs wire/hour) by the emission factor 0.036 lb particulate/lb wire, USEPA 313 Guidance Document for the Metal Fabrication Industry.

Emissions Limitation -

2.16 lbs/day particulate emissions

Applicable Compliance Method -

Compliance shall be based upon recordkeeping as specified in section C and shall be determined by multiplying the daily welding wire usage (60 lbs wire/day) by the emission factor of 0.036 lb particulate/lb wire, USEPA 313 Guidance Document for the Metal Fabrication Industry.

Emissions Limitation -

0.39 ton/year particulate emissions (for each welder)

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in section C and shall be the sum of the daily welding wire usage rates for the calendar year multiplied by the emission factor for welding operations (0.036 lb particulate/lb wire), and dividing by 2,000 lbs/ton.

Emissions Limitation -

5% visible emissions opacity, as a 3-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. **Miscellaneous Requirements**

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 08-3242, as issued on April 26, 1995: A.1, B, C, and D.