



State of Ohio Environmental Protection Agency



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SEP 24 1997

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Auglaize County
Application No: 03-0717

CERTIFIED MAIL

September 24, 1997

CROWN EQUIPMENT CORPORATION
BRIAN DUFFY
40 SOUTH WASHINGTON STREET
NEW BREMEN, OH 45869

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 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. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
NORTHWEST DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 03-0717
APS Premise No. 0306000060
Permit Fee: \$400.00

Name of Facility: CROWN EQUIPMENT CORPORATION

Person to Contact: BRIAN DUFFY

Address: 40^{OR 44} SOUTH WASHINGTON STREET
NEW BREMEN, OH 45869

Location of proposed source(s): 715 HEUNKE ROAD
NEW BREMEN, OHIO 45869

Description of proposed source(s):
MISCELLANEOUS METAL PARTS PAINT SPRAY BOOTH (T-UP-1).

Date of Issuance: September 24, 1997

Effective Date: September 24, 1997

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CROWN EQUIPMENT CORPORATION located in Auglaize County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Miscellaneous metal parts paint spray booth (T-UP-1)	Use of dry filter exhaust system; Compliance with the terms and conditions of this permit	3745-31-05 3745-21-09 (U) (2) (e) 3745-17-07 (A) 3745-17-11 (B)	From coating operation: 10 gallons coating/day 37.90 lbs VOC/day 6.92 tons VOC/year 0.083 lb PM/hour 0.36 ton PM/year 0% opacity See Additional Special Terms and Conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	6.96
PM	0.36

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

The purpose of this permit to install is to allow the Crown Equipment Corporation to install a paint spray booth (T-UP-1), emission unit K001. The permittee has voluntarily accepted a ten gallon per day usage restriction in order to avoid the requirements of OAC 3745-21-09(U)(1).

A. Applicable Emissions Limitations and/or Control Requirements

1. The maximum daily coating usage for emissions unit K001 shall not exceed ten gallons.
2. VOC emissions from the application of coating materials in emissions unit K001 shall not exceed 37.90 pounds per day.

3. VOC emissions from the application of cleanup materials in emissions unit K001 shall not exceed 6.74 pounds per month.
4. VOC emissions from the application of coating and cleanup materials in emission unit K001 shall not exceed 6.96 tons per year.
5. Particulate matter emissions from emissions unit K001 shall not exceed 0.083 pound per hour and 0.36 ton per year.
6. Visible emissions of particulate matter from emissions unit K001 shall not exceed 0 percent opacity, as a six-minute average.
7. Emissions unit K001 shall be equipped with a dry exhaust particulate matter filtration system. The permittee shall operate and maintain this control device in accordance with the manufacturer's recommendations whenever this emission unit is in operation.

B. Operational Restrictions

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI No. 03-0717. There are no significant (>1 TPY) emissions of any compound with a Threshold Limit Value (TLV), and therefore dispersion modeling for OEPA's "Air Toxics Policy" is not required. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office is required, including the possible issuance of modifications to PTI No. 03-0717 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in emissions of a compound with a TLV, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienist (ACGIH)" at a rate greater than 1 ton per year;
 - b. any change to the emissions units or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01:
and,

- c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01].

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:
 - a. For Coating Material Usage
 - i. the name and identification number of each coating employed;
 - ii. the VOC content of each coating in pounds per gallon as applied, excluding water and exempt solvents;
 - iii. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - iv. the total VOC emissions from each coating employed, in pounds per day (C.1.a.ii. x C.1.a.iii.); and,
 - v. the total VOC emissions from all coatings employed, in pounds per day (summation of C.1.a.iv.).
2. The permittee shall collect and record the following information each month for emissions unit K001:
 - a. For Cleanup Material Usage
 - i. the identification of each cleanup material employed;
 - ii. the VOC content of each cleanup material, in pounds per gallon;
 - iii. the number of gallons of each cleanup material employed;
 - iv. the total VOC emissions from each cleanup material employed in pounds per month (C.2.a.ii. x C.2.a.iii.); and,
 - v. the total VOC emissions from all cleanup materials employed, in pounds per month (summation of C.2.a.iv.).

Note: The permittee may also calculate monthly VOC emissions rates in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

Monthly VOC emissions from cleanup operations
= (total gallons of cleanup material used X solvent density) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] X solvent density.

c. For Combined Coating and Cleanup Material Usage

i. The total VOC emissions from all coatings and cleanup materials employed, in pounds per month (summation of C.1.a.v. and C.2.a.v.).

D. **Reporting Requirements**

1. The permittee shall notify the Director of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the Director within 45 days after the exceedance occurs.

E. **Testing Requirements/Compliance Method Determinations**

1. Testing Requirements

a. Compliance with the emission limitations of this permit shall be determined in accordance with the following method:

Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

2. Compliance Method Determinations

a. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

i. Emission Limitation

10 gallons coating/day

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C above.

ii. Emission Limitation

37.90 pounds VOC/day and 6.92 tons VOC/year

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C above.

iii. Emission Limitation

0.083 pound PM/hour and 0.36 ton PM/year

Applicable Compliance Method

Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10). In the absence of Ohio EPA requiring such testing, the permittee may calculate the actual emission rate utilizing the following equation:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

Where:

E=particulate matter emission rate (pounds/hour)

TE=transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part of the amount of coating solids used

CE=control efficiency of the control equipment

iv. Emissions Limitation

0 percent opacity, as a six minute average

Applicable Compliance Method

Compliance with the visible emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B) (1).

F. **Miscellaneous Requirements**

None.