



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Craig W. Butler, Director

3/8/2016

Michael Heiney  
 Detroit Reman PLT. 2  
 60703 Country Club Rd  
 Byesville, OH 43723

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0630010151  
 Permit Number: P0113259  
 Permit Type: Renewal  
 County: Guernsey

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Detroit Reman PLT. 2**

Facility ID:	0630010151
Permit Number:	P0113259
Permit Type:	Renewal
Issued:	3/8/2016
Effective:	3/8/2016
Expiration:	3/8/2026





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Detroit Reman PLT. 2

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**Final Permit-to-Install and Operate**  
Detroit Reman PLT. 2  
**Permit Number:** P0113259  
**Facility ID:** 0630010151  
**Effective Date:** 3/8/2016

## Authorization

Facility ID: 0630010151  
Application Number(s): A0046962  
Permit Number: P0113259  
Permit Description: Renewal PTIO for a paint spray booth, four (4) blasters controlled by baghouses, and five (5) pyrolysis furnaces.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 3/8/2016  
Effective Date: 3/8/2016  
Expiration Date: 3/8/2026  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Detroit Reman PLT. 2  
8475 COMMERCE DRIVE  
CAMBRIDGE, OH 43725

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0113259

Permit Description: Renewal PTIO for a paint spray booth, four (4) blasters controlled by baghouses, and five (5) pyrolysis furnaces.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID: R001**  
 Company Equipment ID: Spray paint booth  
 Superseded Permit Number: 06-08040  
 General Permit Category and Type: Not Applicable

**Group Name: Blasters controlled w/baghouses**

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Spin Blaster 1504
Superseded Permit Number:	06-08001
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Tumble Blaster TBR6
Superseded Permit Number:	06-08001
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Shot Blast WS210-1
Superseded Permit Number:	06-08001
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Shot Blast WS210-2
Superseded Permit Number:	06-08001
General Permit Category and Type:	Not Applicable

**Group Name: Pyrolysis Furnaces**

<b>Emissions Unit ID:</b>	<b>N001</b>
Company Equipment ID:	Oven 1
Superseded Permit Number:	06-08034
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>N002</b>
Company Equipment ID:	Oven 2
Superseded Permit Number:	06-08034
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>N003</b>
Company Equipment ID:	Oven 3
Superseded Permit Number:	06-08034
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>N004</b>
Company Equipment ID:	Oven 4
Superseded Permit Number:	06-08034
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Detroit Reman PLT. 2  
**Permit Number:** P0113259  
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<b>Emissions Unit ID:</b>	<b>N005</b>
Company Equipment ID:	Oven 5
Superseded Permit Number:	06-08034
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Detroit Reman PLT. 2  
**Permit Number:** P0113259  
**Facility ID:** 0630010151  
**Effective Date:** 3/8/2016

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**



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



**Final Permit-to-Install and Operate**  
Detroit Reman PLT. 2  
**Permit Number:** P0113259  
**Facility ID:** 0630010151  
**Effective Date:** 3/8/2016

## **C. Emissions Unit Terms and Conditions**



**1. R001, Spray paint booth**

**Operations, Property and/or Equipment Description:**

Miscellaneous metal parts spray paint booth with air guns and a passive filter with 98% capture efficiency and 98% control efficiency.

a) 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. c(2) and d)(5).

(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.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as established in PTI 06-08040, issued 1/31/2006	Volatile organic compound (VOC) emissions shall not exceed 74 pounds per day from coatings, and 14.0 tons per year, including both coatings and cleanup materials.  Particulate emissions (PE) shall not exceed 0.551 pounds per hour and 2.4 tons per year from coatings.  See c)(1) below.  The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2), OAC rule 3745-17-11(B)(1), and OAC rule 3745-17-07(A)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
c.	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are equivalent to the short term PE limitation included in OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

(2) Additional Terms and Conditions

a. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for control of PE whenever this emissions unit is in operation.

(2) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels.

Data Needed: (1) MSDS sheet for each coating to be evaluated.

(2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1: Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

(a) Assume the coating line operates at its maximum speed while still making usable product.

(b) Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2: Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3: Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed

in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8,760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
Benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinateddibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, arcolors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

**Step 4:** Find all of the chemical compounds in the coating that are listed as an air toxic contaminant in OAC Rule 3745-114. For each chemical compound listed in OAC Rule 3745-114 calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

**Step 5:** Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to  $\mu\text{g}/\text{m}^3$  by using the following formula:  $(\text{TLV in ppm}) \times (\text{MW}) \times (1000) / 24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$ ; where MW is the molecular

weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ( $\mu\text{g}/\text{m}^3$ ) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6: Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

- (2) The permittee shall collect and record the following information each day for this emissions unit:
    - a. The name and identification number of each coating employed.
    - b. The VOC content of each coating employed, in pounds per gallon, as applied.
    - c. The number of gallons of each coating employed.
    - d. The total number of gallons of all the coatings employed.
    - e. The total VOC emissions from all the coatings employed, in pounds [i.e., the sum of (b) times (c) for each coating employed].
  - (3) The permittee shall collect and record the following information for each month for this emissions unit:
    - a. The company identification of each cleanup material employed.
    - b. The number of gallons of each cleanup material employed.
    - c. The VOC content of each cleanup material employed, in pounds per gallon.
    - d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of (b) times (c) for each cleanup employed].
    - e. The amount of cleanup material recovered, in pounds.
    - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
  - (4) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in d)(2)e. plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(3)f.].
  - (5) The permittee shall collect and record the results of any toxic screening evaluations done per c)(2).
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-

Business Center: Air Services” although PERs can be submitted via U.S. postal service or can be hand delivered.

- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)d.

b. Emissions Limitation:

VOC emissions shall not exceed 74 pounds per day from coatings, and 14.0 tons per year, including both coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the pounds per day shall be based upon the record keeping specified in d)(2)e. Compliance with the tons per year shall be based upon the record keeping specified in d)(4).

c. Emissions Limitation:

PE shall not exceed 0.551 pounds per hour and 2.4 tons per year from coatings.

Applicable Compliance Method:

The pounds per hour emission limitation is based on the following equation:

Maximum coating solids usage rate, in pounds per hour (2 lb/hr per permittee's application), x (1 TE) x (1 CE) = 0.551 pounds per hour

Where,

0.55 = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

0.99 = fractional control efficiency of the control equipment (0.98) (From Permittee's application.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation was established by multiplying the maximum hourly emissions of 0.551 pounds per hour by 8,760 hours per year and dividing by 2,000 lbs/ton.

d. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

- (2) If required, visible particulate emissions shall be determined according to USEPA Method 9. US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.

**2. Emissions Unit Group -Blasters controlled w/baghouses: P001, P002, P003, P004,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	290 lbs shot Spin Blaster 1504 controlled with a baghouse with 99% capture efficiency and 99% control efficiency.
P002	290 lbs shot Tumble Blaster TBR6 controlled with a baghouse with 99% capture efficiency and 99% control efficiency.
P003	290 lbs Shot Blast WS210-1 controlled with a baghouse with 99% capture efficiency and 99% control efficiency.
P004	290 lbs Shot Blast WS210-2 controlled with a baghouse with 99% capture efficiency and 99% control efficiency.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3), as established in PTI 06-08001, issued 3/16/2006	Particulate emissions (PE) from both stack and fugitive shall not exceed 0.01 lb/hr and 0.04 ton/yr.  There shall be no visible PE from the baghouse exhaust stack or from fugitive egress points.
b.	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)(1)	The emission limitations specified by these rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) The permittee shall employ a baghouse having a minimum design control efficiency for particulate emissions of 99% during any operation of this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the area immediately above the capture system serving this emissions unit or from the stack. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (2) The permittee shall maintain daily records that document any time periods when the baghouse was not in service when the emissions unit was in operation.
- e) Reporting Requirements
  - (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (3) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the baghouse was not in service when the emissions unit was in operation. The deviation reports shall be submitted within 30 days after the deviation.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emissions Limitations:

PE shall not exceed 0.01 lb/hr and 0.04 ton/yr.

Applicable Compliance Method:

The pound per hour emissions limitation was established by using the emission factor of 27 lb PE/1,000 lb shot, the maximum shot use rate (as submitted in permittee's application), a steel shot adjustment factor, and the baghouse design control efficiency. The emission factor and the adjustment factor are specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.6, Table 13.2.6-1 (9/97).

$PE(\text{lb/hr}) = 27 \text{ lb PE}/1000 \text{ lb shot} \times 290 \text{ lbs shot/hr} \times 0.1 \text{ (emissions using steel shot are 10\% that of sand)} \times 0.01 \text{ (99\% min. baghouse efficiency)} = 0.008 \text{ lb/hr}$

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation was established by the following one-time calculation using the maximum hourly emission rate.

$PE \text{ (tpy)} = 0.008 \text{ lb/hr} \times 8,760 \text{ hrs/yr} \times 0.0005 \text{ ton/lb} = 0.04 \text{ tpy}$

b. Emissions Limitation:

There shall be no visible PE from the baghouse exhaust stack.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

(1) None.

**3. Emissions Unit Group -Pyrolysis Furnaces: N001, N002, N003, N004, N005,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
N001	0.25 mmbtu/hr Controlled Pyrolysis Furnace 1 controlled with an afterburner with 100% capture efficiency and 99% control efficiency for PE, CO, and OC.
N002	0.25 mmbtu/hr Controlled Pyrolysis Furnace 2 controlled with an afterburner with 100% capture efficiency and 99% control efficiency for PE, CO, and OC.
N003	0.25 mmbtu/hr Controlled Pyrolysis Furnace 3 controlled with an afterburner with 100% capture efficiency and 99% control efficiency for PE, CO, and OC.
N004	0.25 mmbtu/hr Controlled Pyrolysis Furnace 4 controlled with an afterburner with 100% capture efficiency and 99% control efficiency for PE, CO, and OC.
N005	0.25 mmbtu/hr Controlled Pyrolysis Furnace 5 controlled with an afterburner with 100% capture efficiency and 99% control efficiency for PE, CO, and OC.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as established in PTI 06-08034, issued 12/29/2005	Particulate emissions (PE) shall not exceed 0.04 lb/hr and 0.18 ton/year.  Visible PE shall not exceed 10% opacity as a six-minute average.
b.	OAC rule 3745-17-07(A) OAC rule 3745-17-09(B)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) The emissions unit shall be installed, operated, and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory pre-set parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.
  - (2) All emissions shall be vented through the secondary combustion chamber (afterburner).

The temperature of the secondary combustion chamber shall be maintained at 1,400 degrees Fahrenheit or greater during operation of the emissions unit. Manufacturer information provided by the permittee indicates that the emissions unit will not operate if the afterburner is not in service or the secondary combustion chamber temperature is less than 1,400 degrees Fahrenheit. Therefore, compliance with c)(1) above shall be used to demonstrate compliance with this operational restriction. Based on the above, no additional monitoring, recordkeeping, and reporting requirements are necessary.
  - (3) The permittee shall only burn natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emissions incident; and
    - e. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE shall not exceed 0.04 lb/hr and 0.18 ton/year.

Applicable Compliance Method:

The pound per hour emissions limitation was established by using the emission factor of 0.04 lb PE/hr supplied by the permittee. The emission factor is based on similar source emission test data provided by the manufacturer.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation was established by multiplying the hourly emission factor by 8,760 hours of operation per year divided by 2,000 pounds per ton. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained.

b. Emissions Limitation:

Visible PE shall not exceed 10% opacity as a six-minute average.



**Final Permit-to-Install and Operate**  
Detroit Reman PLT. 2  
**Permit Number:** P0113259  
**Facility ID:** 0630010151  
**Effective Date:** 3/8/2016

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

- g) Miscellaneous Requirements
  - (1) None.