



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02127

DATE: 6/26/2001

Russell Products Co Forge Division
Tom Allen
275 N Forge St
Akron, OH 44304

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 within thirty (30) days after the notice of the Directors 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 and Permit Section
Division of Air Pollution Control

cc: USEPA

ARAQMD



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 16-02127

Application Number: 16-02127
APS Premise Number: 1677010986
Permit Fee: **\$1000**
Name of Facility: Russell Products Co Forge Division
Person to Contact: Tom Allen
Address: 275 N Forge St
Akron, OH 44304

Location of proposed air contaminant source(s) [emissions unit(s)]:
275 N Forge St
Akron, Ohio

Description of proposed emissions unit(s):
Modifications to R001, R002, K006, Installation of New Blasting Unit, Modification to PTIs 16-1989 and 16-1795.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	15.5
particulate matter	0.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>K003 - Booth 2 East (formerly permitted in PTI 16-1725 issued December 10, 1997), miscellaneous metal parts coating line, spray booth with exhaust fan filter elements to catch paint overspray, emissions of organic compounds & volatile organic compounds (OCs & VOCs) uncontrolled, cleanup performed separately from this emissions unit -- MODIFICATION per PTI 16-02127 to allow coating only miscellaneous metal parts with VOC compliance coatings</p>	<p>OAC rule 3745-31-05 OAC rule 3745-21-09(U)(1)(d)</p>	<p>1.53 pounds/hour and 6.7 tons/year of OCs [See A.2, B.1 through B.3 below] 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (daily volume-weighted average)</p>

2. Additional Terms and Conditions

- 2.a The above hourly and yearly OC emission limits (regulated per OAC rule 3745-31-05) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in an operation separate from this emissions unit.
3. The permittee shall be restricted to coating only miscellaneous metal parts or products, as defined in OAC rule 3745-21-01(D)(40). No other types of parts or products shall be coated in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall document the following incidents each day for the line:
 - a. Spray booth exhaust fan filter elements not employed as required above in section B.1.
 - b. Cleanup performed in this emissions unit.
 - c. Coating other types of parts or products not defined as miscellaneous metal parts or products per OAC rule 3745-21-01(D)(40).
3. The permit to install for K003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration

from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: dibutyl phthalate (CAS 84-74-2)

TLV (ug/m3): 5000

Maximum Average Hourly Emission Rate (lbs/hr): 1.53

Predicted 1-Hour Maximum Ground-Level Concentration at 30 m (ug/m3): 147

MAGLC (ug/m3): 400

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations

to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy."

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily 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 of the occurrence.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing any of the incidents documented above in section C.2. 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 of the incident(s).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (daily volume-weighted average)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Part II, section C.1 of these special terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA

and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitations: 1.53 pounds/hour and 6.7 tons/year of OCs

Applicable Compliance Method: The above OC emission limitations are based on the emission unit's potential to emit, as demonstrated below:

$$\begin{aligned} \text{PTE[OCs]h} &= (\text{CARCmax}) \times (\text{OCCmax}); \text{ and} \\ \text{PTE[OCs]y} &= (\text{PTE[OCs]h}) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

$\text{PTE[OCs]h} = 1.53$ pounds of OCs/hour [hourly potential to emit OCs];

$\text{PTE[OCs]y} = 6.7$ tons of OCs/year [yearly potential to emit OCs];

$\text{CARCmax} = 0.75$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

$\text{OCCmax} = 2.04$ pounds of OCs/gallon of coating [maximum OC content of coatings as applied after any thinning].

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Emissions Unit ID: **K006**

F. Miscellaneous Requirements

1. Permit to install (PTI) 16-02127 supersedes all of the requirements of PTI 16-1725 issued December 10, 1997.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - Booth 1 West (formerly R001, PTI 16-691 issued August 3, 1988 and modified November 16, 1988, and modified again in PTI 16-1795 issued August 26, 1998), miscellaneous metal parts coating line, spray booth with exhaust fan filter elements to catch paint overspray and flash-off/cure ovens, emissions of organic compounds & volatile organic compounds (OCs & VOCs) uncontrolled, cleanup performed separately from this emissions unit -- MODIFICATION per PTI 16-02127 to discontinue coating nonmetal parts and redesignate Ohio EPA emissions unit identification	OAC rule 3745-31-05 OAC rule 3745-21-09(U)(1)(c)	1.0 pound/hour and 4.4 tons/year of OCs [See A.2, B.1 through B.3 below] 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

2. Additional Terms and Conditions

- 2.a The above hourly and yearly OC emission limits (regulated under OAC rule 3745-31-05) are greater than the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed

change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in an operation separate from this emissions unit.
3. The permittee shall be restricted to coating only miscellaneous metal parts or products, as defined in OAC rule 3745-21-01(D)(40). No other types of parts or products shall be coated in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall document the following incidents each day for the line:
 - a. Spray booth exhaust fan filter elements not employed as required above in section B.1.
 - b. Cleanup performed in this emissions unit.
 - c. Coating other types of parts or products not defined as miscellaneous metal parts or products per OAC rule 3745-21-01(D)(40).

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily 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

Emissions Unit ID: **K010**

Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month of the occurrence.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing any of the incidents documented above in section C.2. 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 of the incident(s).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Part II, section C.1 of these special terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitations: 1.0 pound/hour and 4.4 tons/year of OCs

Applicable Compliance Method: The above OC emission limitations are greater than the emission unit's potential to emit, as demonstrated below:

$$\begin{aligned} \text{PTE}[\text{OCs}]_h &= (\text{CARC}_{\text{max}}) \times (\text{OCC}_{\text{max}}); \text{ and} \\ \text{PTE}[\text{OCs}]_y &= (\text{PTE}[\text{OCs}]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

$\text{PTE}[\text{OCs}]_h = 0.9$ pound of OCs/hour [hourly potential to emit OCs];

$\text{PTE}[\text{OCs}]_y = 4.0$ tons of OCs/year [yearly potential to emit OCs];

$\text{CARC}_{\text{max}} = 0.5$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

$\text{OCC}_{\text{max}} = 1.82$ pounds of OCs/gallon of coating [maximum OC content of coatings as

applied after any thinning].

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. Permit to install (PTI) 16-02127 supersedes all of the requirements of PTI 16-691 issued August 3, 1988 and the modification of PTI 16-691 November 16, 1988, and PTI 16-1795 issued August 26, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K011 - Booth 2 West (formerly R001, PTI 16-691 issued August 3, 1988 and modified November 16, 1988, and modified again in PTI 16-1795 issued August 26, 1998), miscellaneous metal parts coating line, spray booth with exhaust fan filter elements to catch paint overspray and flash-off/cure ovens, emissions of organic compounds & volatile organic compounds (OCs & VOCs) uncontrolled, cleanup performed separately from this emissions unit -- MODIFICATION per PTI 16-02127 to discontinue coating vinyl parts and redesignate Ohio EPA emissions unit identification	OAC rule 3745-31-05 OAC rule 3745-21-09(U)(1)(c)	1.0 pound/hour and 4.4 tons/year of OCs [See A.2, B.1 through B.3 below] 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

2. Additional Terms and Conditions

- 2.a The above hourly and yearly OC emission limits (regulated under OAC rule 3745-31-05) are greater than the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed

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Emissions Unit ID: **K011**

change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in an operation separate from this emissions unit.
3. The permittee shall be restricted to coating only miscellaneous metal parts or products, as defined in OAC rule 3745-21-01(D)(40). No other types of parts or products shall be coated in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall document the following incidents each day for the line:
 - a. Spray booth exhaust fan filter elements not employed as required above in section B.1.
 - b. Cleanup performed in this emissions unit.
 - c. Coating other types of parts or products not defined as miscellaneous metal parts or products per OAC rule 3745-21-01(D)(40).

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily 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 of the occurrence.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing any of the incidents documented above in section C.2. 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 of the incident(s).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Part II, section C.1 of these special terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitations: 1.0 pound/hour and 4.4 tons/year of OCs

Applicable Compliance Method: The above OC emission limitations are greater than the emission unit's potential to emit, as demonstrated below:

$$\begin{aligned} \text{PTE}[\text{OCs}]_h &= (\text{CARC}_{\text{max}}) \times (\text{OCC}_{\text{max}}); \text{ and} \\ \text{PTE}[\text{OCs}]_y &= (\text{PTE}[\text{OCs}]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

$\text{PTE}[\text{OCs}]_h = 0.06$ pound of OCs/hour [hourly potential to emit OCs];

$\text{PTE}[\text{OCs}]_y = 0.3$ ton of OCs/year [yearly potential to emit OCs];

$\text{CARC}_{\text{max}} = 0.5$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

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OCCmax = 0.121 pound of OCs/gallon of coating [maximum OC content of coatings as applied after any thinning].

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. Permit to install (PTI) 16-02127 supersedes all of the requirements of PTI 16-691 issued August 3, 1988 and the modification of PTI 16-691 November 16, 1988, and PTI 16-1795 issued August 26, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 - Blaster 2, grit blast cabinet, air emissions of particulate matter (PM) controlled by an enclosure with baghouse, exhausted outside	OAC rule 3745-31-05	no visible emissions of PM; and 0.6 lb/hr and 0.9 tpy of PM [See sections A.2, B.1, and B.2 below for additional requirements of OAC rule 3745-31-05.]
	OAC rule 3745-17-07	The visible particulate emissions limitation required by OAC rule 3745-17-07 is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-11	The mass particulate emissions limitation required by OAC rule 3745-17-11 is less stringent than the mass particulate emissions limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- 2.a The permittee shall employ a properly installed, adjusted, operated, and maintained dust collector system (i.e., fabric filter, or comparable control device, enclosure, ductwork, fan, and any other equipment necessary to capture, contain, and vent air emissions of PM to

the applicable air pollution control device) serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, to the extent possible with good engineering design.

- 2.b** The above hourly mass PM emission limitation (regulated per OAC rule 3745-31-05) is based on the potential to emit for this emissions unit (determined from operational assumptions reported in the application) as demonstrated below in section E.1.b. The above annual mass PM emission limitation (regulated per OAC rule 3745-31-05) is based on restricted hours of operation (see section B.2 below) as demonstrated below in section E.1.b. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with these emission limitations. However, should compliance with these emission limitations ever become suspect, then the permittee may be required to perform emission testing, employing all applicable USEPA test methods, to establish accurate and representative emission limitations for this emissions unit.

B. Operational Restrictions

1. The dust collector system serving this emissions unit shall be employed at all times the emissions unit is in operation.
2. This emissions unit shall be restricted to operating no more than 3000 hours per year. The permittee has accepted this restriction to avoid subjectivity to the Ohio EPAs "Air Toxics Policy".

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document whether or not the dust collector system serving this emissions unit was in service when the emissions unit was in operation.
2. The permittee shall perform daily visible particulate emission checks of the dust collector system serving this emissions unit, while the emissions unit is in operation. The presence of any visible emissions from the dust collector system shall be noted in an operations log. If any visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.
3. The permittee shall keep a log of the operating time of this emissions unit during each calendar year.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in

writing of any record in which the dust collector system serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the dust collector system and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
3. The permittee shall submit deviation (excursion) reports no later than January 31 of each year identifying any exceedances of the of the operating hours restriction, required of this emissions unit, during the previous calendar year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

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

- a. Emission Limitation: no visible emissions of PM

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(4).

- b. Emission Limitation: 0.6 lb/hr and 0.9 tpy of PM

Applicable Compliance Method: The above emission limitations are based on the potential to emit, as demonstrated in the equations below:

$$\begin{aligned} \text{PTEh} &= (\text{MUmax}) \times (1-\text{C}); \text{ and} \\ \text{PTEy} &= (\text{PTEh}) \times (\text{T}) \times (1 \text{ ton}/2000 \text{ pounds}) \end{aligned}$$

Where,

$$\begin{aligned} \text{PTEh} &= 0.6 \text{ lb/hr of PM [hourly potential emissions];} \\ \text{PTEy} &= 0.9 \text{ tpy of PM [yearly potential emissions, based on operating hours restriction];} \end{aligned}$$

MU_{max} = 30 lbs/hr of blasting material usage [maximum design capacity];
C = 98% or 0.98 [overall control efficiency of dust collector system]; and
T = 3000 hrs/yr [operating hours restriction to avoid subjectivity to "Air Toxics Policy"].

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 16-02127

Facility ID: 1677010986

FACILITY NAME Russell Products Co Forge Division

FACILITY DESCRIPTION Modifications to R001. R002. K003.

CITY/TWP Akron

Emissions Unit ID: **P007**

SIC CODE 3479

SCC CODE 4-02-999-98

EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Booth 2 East, miscellaneous metal parts coating line, spray booth with exhaust fan filter elements -- MODIFICATION to allow change from 3 gallons/day coating usage limitation to compliance coatings restriction

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				1.53 lbs/hr	6.7
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination filter elements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

dibutyl phthalate

NEW SOURCE REVIEW FORM B

PTI Number: 16-02127 Facility ID: 1677010986

FACILITY NAME Russell Products Co Forge Division

FACILITY DESCRIPTION Modifications to R001. R002. K003. CITY/TWP Akron

Emissions Unit ID: **P007**

SIC CODE 3479 SCC CODE 4-02-999-98 EMISSIONS UNIT ID K010

EMISSIONS UNIT DESCRIPTION K010 - Booth 1 West (formerly R001, PTI 16-691 issued August 3, 1988 and modified November 16, 1988, and modified again in PTI 16-1795 issued August 26, 1998), miscellaneous metal parts coating line, spray booth with exhaust fan filter elements and flash-off oven, cleanup performed separately from this emissions unit -- **MODIFICATION** to discontinue coating vinyl parts and redesignate Ohio EPA emissions unit identification

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				1.0 lbs/hr	4.4
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination filter elements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 16-02127 Facility ID: 1677010986

FACILITY NAME Russell Products Co Forge Division

FACILITY DESCRIPTION Modifications to R001. R002. K003. CITY/TWP Akron

Emissions Unit ID: **P007**

SIC CODE 3479 SCC CODE 4-02-999-98 EMISSIONS UNIT ID K011

EMISSIONS UNIT DESCRIPTION K011 - Booth 2 West (formerly R002, PTI 16-691 issued August 3, 1988 and modified November 16, 1988, and modified again in PTI 16-1795 issued August 26, 1998), miscellaneous metal parts coating line, spray booth with exhaust fan filter elements and flash-off oven, cleanup performed separately from this emissions unit -- **MODIFICATION** to discontinue coating vinyl parts and redesignate Ohio EPA emissions unit identification

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				1.0 lbs/hr	4.4
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination filter elements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02127 Facility ID: 1677010986

FACILITY NAME Russell Products Co Forge Division

FACILITY DESCRIPTION Modifications to R001. R002. K003. CITY/TWP Akron

Emissions Unit ID: **P007**

SIC CODE 3479 SCC CODE 3-09-002-05 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION Blaster 2, grit blast cabinet, air emissions of particulate matter (PM) controlled by an enclosure with baghouse, exhausted outside

DATE INSTALLED 7/99

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter				0.6 lb/hr	0.9
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination enclosure and fabric filter

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____