



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700
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P.O. Box 1049
Columbus, OH 43216-1049

10/1/2008

John Lauffer
Electro Prime Rossford
63 Dixie Highway
Rossford, OH 43460

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0487010075
Permit Number: P0088678
Permit Type: Renewal
County: Wood

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Sentinel-Tribune. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Indiana; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Electro Prime Rossford

Issue Date: 10/1/2008

Permit Number: P0088678

Permit Type: Renewal

Permit Description: The HAPs that made this facility TV has been delisted and this PTIO was written to get the facility out of TV status.

Facility ID: 0487010075

Facility Location: Electro Prime Rossford
63 Dixie Highway,
Rossford, OH 43460

Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mohammad Smidi at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Electro Prime is an electrocoating operation with curing oven which coats miscellaneous metal parts with a two-part epoxy paint and is located in Rossford, Ohio in Wood County. The facility currently has a Title V permit because they were considered a major source for HAPs (the facility emitted glycol ether in excess of 10 tpy). Glycol ether was delisted as a HAP as published in the Federal Register effective November 29, 2004. Therefore, the facility has applied for an FEPTIO (with federally enforceable terms and conditions for a rolling, 12-month tpy emissions limit for VOCs and glycol ether (an air toxic) as established in PTI 04-01140, modified July 8, 1999). Because there have not been any process changes at this facility, emissions limitations will remain the same and a new air toxics modeling analysis was not performed for glycol ether.

3. Facility Emissions and Attainment Status:

The facility is currently considered a minor source for CO, NOx, PM10, SO2, and VOC. Wood County has the following attainment status:

Pollutants	Air Quality Description
Particulate Matter	Unclassified
PM ₁₀	Attainment
Sulfur Dioxide	Attainment
Organic Compounds	Attainment
Nitrogen Oxides	Attainment
Carbon Monoxide	Attainment
Lead	Unclassified

4. Source Emissions:

The combined emissions from the e-coating line and fuel burning will be 43.3 tpy VOC, 2.16 tpy CO, 2.58 tpy NOx, 0.20 tpy PE, and 0.02 tpy SO2.

5. Conclusion:

When PTI 04-01140 was prepared, Electro Prime Rossford requested the following emission limitations of 0.09 lb VOC/gal of resin, 0.62 lb HAP/gal of resin and 1.07 lb /gal of paste for VOC and HAPs individually. This was defined as BAT. The company also requested a limit of emissions of VOCs and HAPs to 70% of the maximum potential to emit which became BAT. Federally enforceable limits were added to the permit.



However, glycol ether was delisted as a HAP as published in the Federal Register effective November 29, 2004.

Therefore, the facility has applied for an FEPTIO (with federally enforceable terms and conditions for a rolling, 12-month tpy emissions limit for VOCs and glycol ether (an air toxic) as established in PTI 04-01140, modified July 8, 1999).

6. Please provide additional notes or comments as necessary:

Electro Prime, an electrocoating operation with curing oven located in Rossford, Ohio, Wood County, has submitted an FEPTIO application. The application is to get the facility out of Title V status. The facility currently has a Title V permit because they were considered a major source for HAPs (the facility emitted glycol ether in excess of 10 tpy). Glycol ether was delisted as a HAP as published in the Federal Register effective November 29, 2004. Therefore, the facility has applied for an FEPTIO (with federally enforceable terms and conditions for a rolling, 12-month tpy emissions limit for VOCs and glycol ether (an air toxic) as established in PTI 04-01140, modified July 8, 1999). Because there have not been any process changes at this facility, emissions limitations will remain the same and a new air toxics modeling analysis was not performed for glycol ether.

Applicable Rules & Regulations

OAC rule 3745-31-05	Best available technology
OAC rule 3745-21-09(U)(1)(i)	3.0 lb VOC/gallon minus water and exempt solvents.
OAC rule 3745-17-07(A)(1)	20% opacity as a 6-minute average, unless otherwise specified by the rule
OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu actual heat input
OAC rule 3745-18-06(A)	exemption from OAC rule 3745-18-06(D) on days when only natural gas is fired
OAC rule 3745-21-08(B)	Rescinded
OAC rule 3745-23-06(B)	Rescinded

BAT Determination

BAT was established in PTI 04-01140, modified July 8, 1999. The BAT determination has not changed for this PTIO application and has been restated for background information only. The basis of BAT was indicated in PTI 04-01140 below. **Glycol ether was delisted as a HAP as published in the Federal Register effective November 29, 2004. Therefore, the facility has applied for an FEPTIO (with federally enforceable terms and conditions for a rolling, 12-month tpy emissions limit for VOCs and glycol ether (an air toxic) as established in PTI 04-01140, modified July 8, 1999). Because there have not been any process changes at this facility, emissions limitations will remain the same and all references to HAPs have been changed to reflect glycol ether, an air toxic. A new air toxics modeling analysis was not performed for glycol ether.**

The following information was provided in the original PTI (04-01140, modified July 8, 1999) and is for background purposes only.

“This facility is primarily an electrocoating operation. RACT is compliance with OAC rule 3745-21-09(U) (i) which is 3.0 lb VOC per gallon minus water and exempt solvents. The paint supplier has advised our office that method 24 will not give an accurate estimate of the VOC emissions from this type of epoxy based



coating. Chemical reactions (cross-linking of the resin) occur as the coating is cured in the drying oven. These reactions generate additional glycol ethers which add to the total amount emitted. The manufacturer estimates that approximately 7 times more glycol ether is emitted at the stack, than the amount predicted by a material balance based on a Method 24 test for the resin. After cross linking takes place in the curing oven, the VOC emissions will equal the glycol ether emissions. The coating consists of a mixture of deionized water, CR648 Resin and CP623 Paste and the following table estimates emissions based on the manufacturers data.”

“Electro Prime Rossford has requested the following emission limitations of 0.09 lb VOC/gal of resin, 0.62 lb glycol ether/gal of resin and 1.07 lb /gal of paste for VOC and glycol ether individually. This will be defined as BAT. The company has also requested a limit of emissions of VOCs and glycol ether to 70% of the maximum potential to emit which will become BAT. The permit allowable emission rates are:

14 lb VOC/hr 43 tons VOC/yr”

***Note: the 14 lb glycol ether/hr; 43 tons glycol ether/yr emission limit was moved out of BAT and moved under the air toxics rule citation (ORC 3704.03(F)(4)).**

Source Emissions

PTI 04-01140 provided calculations for the PTE and permit allowable emissions. **The emissions values have not changed with this PTIO application, although all references to HAPs have been changed to glycol ether which was delisted as a HAP. The previous calculations have not changed with this PTIO application and are restated for background information only:**

Maximum Potential to Emit (VOC):

The coating line is capable of applying 56.1 gal/hr of coating where each 1,000 gallon batch consists of 352 gallons of CR648 resin and 30 gallons of CP623 paste. Based on 8,760 hours of operation for the year, the maximum potential to emit in the curing oven where the cross linking occurs and an approximate emission factor of 6.89:

PTE_{VOCR} =	56.1 gal coating	352 gal Resin	0.09 lb VOC * 6.89	8760 hr	1 ton
	hour	1000 gal coating	gal Resin	year	2000 lb

$PTE_{VOCR} = 53.6 \text{ ton VOC/yr for the resin,}$

Similarly for the paste, the maximum potential to emit in the curing oven based on 8760 hours per year is:

$PTE_{VOCP} =$	56.1 gal coating	30 gal Paste	1.07 lb VOC	8760 hr	1 ton
	hour	1000 gal coating	gal Paste	year	2000 lb



$$PTE_{VOC\,P} = 7.9 \text{ ton VOC/yr for the paste}$$

The maximum potential to emit of VOCs for the year is: **61.5 ton VOCs/yr or 14 lb VOC/hr**

***In PTIO P0088678 all references to HAPs have been changed to glycol ether which was delisted as a HAP.**

Maximum Potential to Emit (glycol ether):

Using the same batch ratio established above and the same application rate of 56.1 gal/hr of coating, the maximum potential to emit for glycol ethers in the curing oven is:

$PTE_{\text{glycol etherR}}$ =	56.1 gal coating	352 gal Resin	0.62 lb glycol ether	8760 hr	1 ton
	hour	1000 gal coating	gal Resin	year	2000 lb

$$PTE_{\text{glycol etherR}} = 53.6 \text{ ton glycol ether/yr for the resin}$$

Similarly for the paste, the maximum potential to emit in the curing oven based on 8760 hours per year is:

$PTE_{\text{glycol etherP}}$ =	56.1 gal coating	30 gal Paste	1.07 lb glycol ether	8760 hr	1 ton
	hour	1000 gal coating	gal Paste	year	2000 lb

$$PTE_{\text{glycol etherP}} = 7.9 \text{ ton glycol ether/yr for the paste}$$

The maximum potential to emit of glycol ether for the year is: **61.5 ton glycol ether/yr or 14 lb glycol ether/hr**

***In PTIO P0088678 all references to HAPs have been changed to glycol ether which was delisted as a HAP.**

Permit Allowable Emissions and Emission Rate

Electroprime has requested to limit the emissions to 70% of the maximum potential to emit as their permit allowable emissions. Since the emissions come from the curing oven, the VOC and glycol ether emissions represent a yearly total limit.



The permit will set 14 lb VOC/hr and 14 lb glycol ether/hr as the short term limit.

Maximum Potential to Emit	* 70%	= Allowable Emissions	TOTALS (TPY)
53.6 ton VOC/yr from Resin	0.70	= 37.5 ton VOC/yr from Resin	43.0 VOCs
7.9 ton VOC/yr from Paste	0.70	= 5.5 ton VOC/yr from Paste	
53.6 ton glycol ether/yr from Resin	0.70	= 37.5 ton glycol ether/yr from Resin	43.0 Glycol ether
7.9 ton glycol ether/yr from Paste	0.70	= 5.5 ton glycol ether/yr from Paste	

FUEL BURNING EMISSIONS AND HOURLY EMISSION RATE

The curing oven has two burners rated at 3,000,000 BTU/hr each. The total heat produced for the year is:

$$\text{Gas/yr} = \frac{2 \text{ burners} \times 3,000,000 \text{ BTU/hr} \times 1 \text{ ft}^3}{1020 \text{ BTU}} \times 8760 \text{ hr/yr}$$

Gas/yr = 51.5 MMft³/yr

Using AP-42 emission factors (March of 1998) for natural gas combustion from Tables 1.4-1 and 1.4-2, the following formula is used to calculate the pollutant annual emissions:

Emission factor X Fuel Usage ÷ 2000 lb/ton = Annual Emission

Pollutant	Emission Factor (lb/10 ⁶ scf)	Fuel Usage (MMft ³ /yr)	Conversion factor	Annual Emission (ton/yr)	Hourly Emission Rate (lb/hr)
PM	7.6	51.5	2000 lb/ton	0.20	0.05
SO ₂	0.6	51.5	2000 lb/ton	0.02	0.004
NOx	100	51.5	2000 lb/ton	2.58	0.59
CO	84	51.5	2000 lb/ton	2.16	0.49
TOC	11	51.5	2000 lb/ton	0.28	0.06



The Permit Allowable Emissions will be set equal to the Annual Emissions as shown in the above table, column 5.

TOTAL PERMIT ALLOWABLE EMISSIONS AND EMISSION RATES:
(Natural Gas and Coatings)

Pollutant	Allowable Emissions (TPY)	Allowable Emission Rate (lb/hr)
PM	0.20	0.05
SO ₂	0.02	0.004
NO _x	2.58	0.59
CO	2.16	0.49
TOC	0.28 + 43.0 = 43.3	0.06 + 14.0 = 14.0

Assume the Actual Emissions are approximately 75% of the Permit Allowable Emissions. Then the Permit Actual Emissions will be:

Pollutant	Actual Emissions (TPY)
PM	0.15
SO ₂	0.01
NO _x	1.9
CO	1.6
TOC	32.5

***In PTIO P0088678 all references to HAPs have been changed to glycol ether which was delisted as a HAP.**

Air Toxics Analysis

Because there have not been any changes to the process, the air toxics modeling was not redone for this PTIO.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	2.16 (unchanged)
NO _x	2.58 (unchanged)
PE	0.2 (unchanged)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0088678
Facility ID: 0487010075

SO ₂	0.02 (unchanged)
VOC	43.3 (unchanged)
Glycol Ether	43.3 (unchanged)

***In PTIO P0088678 all references to HAPs have been changed to glycol ether which was delisted as a HAP.**



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Electro Prime Rossford**

Facility ID: 0487010075
Permit Number: P0088678
Permit Type: Renewal
Issued: 10/1/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Electro Prime Rossford

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0088678

Facility ID: 0487010075

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0487010075

Application Number(s): A0019859

Permit Number: P0088678

Permit Description: The HAPs that made this facility TV has been delisted and this PTIO was written to get the facility out of TV status.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 10/1/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Electro Prime Rossford
63 Dixie Highway
Rossford, OH 43460

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0088678

Facility ID: 0487010075

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0088678

Permit Description: The HAPs that made this facility TV has been delisted and this PTIO was written to get the facility out of TV status.

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

Emissions Unit ID:	K001
Company Equipment ID:	Ecoat Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0088678

Facility ID: 0487010075

Effective Date: To be entered upon final issuance

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 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 Toledo Department of Environmental Services 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0088678

Facility ID: 0487010075

Effective Date: To be entered upon final issuance

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.



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Division of Air Pollution Control

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B. Facility-Wide Terms and Conditions



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Facility ID: 0487010075

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0088678

Facility ID: 0487010075

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, Ecoat Line with curing oven

Operations, Property and/or Equipment Description:

Ecoat line

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 operations(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. 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
electro-cathodic coating tank for miscellaneous metal parts with no controls		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-1140 - issued Feb. 3, 1999 and modified on July 8, 1999)	0.09 pound of volatile organic compounds (VOC) per gallon of resin, excluding water and exempt solvents 1.07 pounds of VOC per gallon of paste, excluding water and exempt solvents 14 lbs/hr of VOC 43.0 tons of VOC per rolling, 12-month period 14 lbs/hr of glycol ether 43.0 tons of glycol ether per rolling, 12-month period See b)(2)a.
b.	OAC rule 3745-21-09(U)(1)(i)	See b)(2)b.
c.	ORC 3704.03(F)(4)	See d)(4) through d)(6)
6 mmBtu/hr indirect-fired natural gas curing oven with no controls		
d.	OAC rule 3745-31-05(A)(3) (PTI 04-1140 - issued Feb. 3, 1999 and modified on July 8, 1999)	0.05 lb/hr of particulate emissions* 0.20 tpy of particulate emissions* 0.004 lb/hr of sulfur dioxide (SO2)* 0.02 tpy of SO2* 0.59 lb/hr of nitrogen oxides (NOx)*



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		2.58 tpy of NOx*
		0.49 lb/hr of carbon monoxide (CO)* 2.16 tpy of CO*
		0.06 lb/hr of total organic compounds (TOC)* 0.3 tpy of TOC*
		* These emission limitations reflect the potentials to emit for this emissions unit. Therefore, there are no additional monitoring or record keeping requirements necessary to demonstrate compliance with these emission limitations.
		See b)(2)c.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
g.	OAC rule 3745-18-06	See b)(2)d.
h.	OAC rule 3745-21-08(B)	See b)(2)e.

(2) Additional Terms and Conditions

- a. The emissions from the curing oven include emissions due to the cross linking of the resin.
- b. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3).
- c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-21-08(B).
- d. This emissions unit is exempt from the requirements specified in OAC rule 3745-18-06(D), (F), and (G) and OAC rules 3745-18-07 to 3745-18-94 because the rated heat input capacity is <10 mmBtu/hr.
- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 04-1140.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the



requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas as fuel 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 collect and record the following information each day for the line:
 - a. the name and identification number of each resin and paste added to the coating tank;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each resin and paste added to the coating tank;
 - c. the daily volume-weighted average VOC content of all resin(s) and the daily volume-weighted average VOC content of all paste(s) added, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,1}$;
 - d. the total number of hours the emissions unit was in operation; and
 - e. the hourly emissions of VOC; calculated by multiplying the daily volume-weighted average VOC content of resin (lb VOC/gal) by the number of gallons of resin used and adding to the daily volume-weighted average VOC content of paste (lb VOC/gal) multiplied by the number of gallons of paste. Divide this total VOC (lb) by the number of hours of operation d. and multiply by the correction factor (see f)(1)c.) as determined during the most recent stack test which demonstrated compliance with the emission limit.
 - (3) The permittee shall maintain a monthly record of the total emissions of VOC and the rolling, 12-month summation of VOC emissions, in tons.
 - (4) The PTIO application for this/these emissions unit(s), K001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute^e, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A^e, as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices Δ ; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices Δ ; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., $\Delta X \Delta$ hours per day and $\Delta Y \Delta$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case Δ toxic contaminant(s):

Toxic Contaminant: glycol ether (2-butoxy ethanol)

TLV (mg/m3): 120,000

Maximum Hourly Emission Rate (lbs/hr): 14.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 624.3

MAGLC (ug/m3): 2857

The permittee, has demonstrated that emissions of glycol ether (2-butoxy ethanol), from emissions unit(s) K001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Δ Toxic Air Contaminant Statute Δ , ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration Δ , the permittee shall re-model the



change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute[®] 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. An identification of each day during which the VOC content exceeded 0.09 lb/gal of resin or 1.07 lbs/gal of paste, excluding water and exempt solvents; the actual lb VOC/gal of resin and the actual lb/gal of paste for such day;
 - ii. An identification of each day during which the average hourly organic compound emissions exceeded 14 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - iii. An identification of all exceedances of the rolling, 12-month emission limitation for volatile organic compounds (VOCs) from K001.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).
 - e. The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall notify the Toledo Division of Environmental Services of any daily record showing noncompliance. A copy of such record shall be sent to the Toledo Division of Environmental Services within 45 days following the end of the calendar month.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitations:

0.09 pound of VOC per gallon of resin, excluding water and exempt solvents

1.07 pounds of VOC per gallon of paste, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with these emission limitations shall be determined in accordance with OAC rule 3745-21-10(B) and the records required pursuant to d)(2).

USEPA Method 24 shall be used to determine the VOC contents of the resin or paste. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 cannot be used for a particular resin or paste, 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.

c. Emission Limitation:

14.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements in c)(2) using a correction factor determined during the most recent stack test that demonstrated compliance (3.5 lbs of VOC from the stack per lb of VOC added to the tank).

The permittee demonstrated through stack testing performed on November 11, 2000 that 3.5 times more VOC is emitted from curing the resin than predicted from a material balance based on Method 24 for the resin.



Additional stack testing performed in accordance with the methods below may revise this correction factor. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, or 25A, as appropriate.

d. Emission Limitation:

43.0 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the records required pursuant to section d)(3).

e. Emission Limitations:

0.05 lb/hr of particulate emissions

0.004 lb/hr of SO₂

0.59 lb/hr of NO_x

0.49 lb/hr of CO

0.06 lb/hr of TOC

Applicable Compliance Method:

These potential to emit emission limitations were established by multiplying the emission factors for natural gas combustion listed below by the emissions unit's maximum hourly gas firing capacity (.006 mm cu. ft/hr).

These emission factors are specified in the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 (2/98) and 1.4-2 (7/98).

Pollutant AP-42 Emission Factor (lb(s)/mm scf)

particulates 7.6

SO₂ 0.6

NO_x 100

CO 84

TOC 11

f. Emission Limitations:

0.20 tpy of particulate emissions

0.02 tpy of SO₂



2.58 tpy of NOx

2.16 tpy of CO

0.30 tpy of TOC

Applicable Compliance Method:

These potential to emit emission limitations were established by multiplying the hourly potential to emit emission limitations by 8760 and dividing by 2000 lbs/ton. The actual ton per year emissions for each pollutant above can be determined by multiplying the hourly potential to emit emission limitations by the actual hours of operation per year (from section d)), and then dividing by 2000 lbs/ton.

g. Emission Limitation:

14.0 lbs/hr of glycol ether

Applicable Compliance Method:

All VOC will be assumed to be composed of glycol ether for the purpose of demonstrating compliance with this emission limitation. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly VOC emission limitation (see f)(1)c.). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, or 25A, as appropriate.

h. Emission Limitation:

43.0 tons of glycol ether per rolling, 12-month period

Applicable Compliance Method:

All VOC will be assumed to be composed of glycol ether for the purpose of demonstration of compliance with this emission limitation. Compliance with this emission limitation can be assumed provided that the permittee complies with the rolling, 12-month VOC emission limitation (see f)(1)d.).

(2) The above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-1140, modified on July 8, 1999: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.