



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

12/3/2008

Certified Mail

Heather Klesch  
Clow Water Systems Company  
P. O. Box 6001  
2266 South Sixth Street  
Coshocton (Tuscarawas Twp, OH 43812-6001

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0616010006  
Permit Number: P0103846  
Permit Type: Initial Installation  
County: Coshocton

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The 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 (DAPC) 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 Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138

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 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 is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-SEDO; West Virginia

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



PUBLIC NOTICE  
Issuance Of Draft Air Pollution Permit-To-Install  
Clow Water Systems Company

Issue Date: 12/3/2008  
Permit Number: P0103846  
Permit Type: Initial Installation  
Permit Description: new 379 ton per hour zinc arc spray machine  
Facility ID: 0616010006  
Facility Location: Clow Water Systems Company  
P. O. Box 6001, 2266 South Sixth Street  
Coshocton (Tuscarawas Twp, OH 43812-6001  
Facility Description: Iron Foundries

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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Cara Cherry at Ohio EPA DAPC, Southeast District Office, 2195 Front Street or (740)385-8501. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Permit Strategy Write-Up  
Permit Number: P0103846  
Facility ID: 0616010006

## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Clow Water Systems is a ductile iron foundry that manufactures pipe in Coshocton, Ohio (Coshocton County). Clow is an existing PSD facility. The company is seeking to permit a new zinc arc coating machine to apply zinc coating to pipes (EU K010).

3. Facility Emissions and Attainment Status:

Except for Franklin Township (which the Clow facility does not reside in), Coshocton County is currently in attainment for all ambient air quality standards and is not designated as an appendix A area. With the addition of emissions unit K010, Clow is adding a total of 13.53 tpy of PM10 emissions which required state modeling but did not exceed the PSD significance level of 15 tpy. This unit does not emit volatile organic compounds or air toxics in excess of 1 tpy.

4. Source Emissions:

This permit authorizes the emission of 13.53 tpy of particulate (both fugitive and stack) from the new zinc arc coating machine. This emission rate is based upon the federally enforceable limits on zinc coating processed (1,453,715 per year) and hours of operation (3,840 hours per year).

5. Conclusion:

The operational restrictions, emissions limits, monitoring and record keeping requirements in this permit are sufficient to limit the potential to emit for this unit to below PSD significance levels, so PSD review was not required. The federally enforceable limits on zinc coating processed (1,453,715 per year) and hours of operation (3,840 hours per year) limit total stack and fugitive PM10 emissions from this emissions unit to 13.53 tpy.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM10	13.53





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install**  
for  
Clow Water Systems Company

Facility ID: 0616010006  
Permit Number: P0103846  
Permit Type: Initial Installation  
Issued: 12/3/2008  
Effective: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
for  
Clow Water Systems Company

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103846

**Facility ID:** 0616010006

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0616010006

Facility Description: Ductile Iron Pipe and Fittings.

Application Number(s): A0035859

Permit Number: P0103846

Permit Description: new 379 ton per hour zinc arc spray machine

Permit Type: Initial Installation

Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 12/3/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Clow Water Systems Company  
P. O. Box 6001  
2266 South Sixth Street  
Coshocton (Tuscarawas Twp, OH 43812-6001

of a Permit-to-Install 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:

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

The above named entity is hereby granted a Permit-to-Install for the 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 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

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103846

**Facility ID:** 0616010006

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0103846

Permit Description: new 379 ton per hour zinc arc spray machine

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

<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	Zinc Arc Spray
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**

**Permit Number:** P0103846

**Facility ID:** 0616010006

**Effective Date:** To be entered upon final issuance

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



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. **Compliance Requirements**

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- 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 state-only required 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 Ohio EPA DAPC, Southeast District Office. 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



(i.e., postmarked) quarterly, 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.)

## **10. 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).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

**12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103846

**Facility ID:** 0616010006

**Effective Date:** To be entered upon final issuance

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103846

**Facility ID:** 0616010006

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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103846

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



**1. K010, Zinc Arc Spray**

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

Zinc Arc Spray Machine controlled with a baghouse; includes zinc coating preparation emissions

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) (g)(1).

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
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE)/emissions of particulate matter less than 10 microns (PM<sub>10</sub>) from the stack serving this emissions unit shall not exceed 0.0080 grains per dry standard cubic foot (gr/dscf).</p> <p>PE from emissions unit K010 shall not exceed 13.53 tons per year.</p> <p>No visible particulate emissions shall be emitted from the stack serving this emissions unit.</p> <p>The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-07(A), 3745-17-11(B)(1) and 3745-17-11(C).</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD requirements)	PM <sub>10</sub> emissions from emissions unit K010 shall not exceed 13.53 tons based on a rolling, 12-month summation.
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b(2)a. below.
d.	OAC rule 3745-17-07(B)	See b)(2)b. below.
e.	OAC rule 3745-17-08(B)	See b)(2)b. below.
f.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)a. below.
g.	OAC rule 3745-17-11(C)	See b)(2)c. and d. below.

(2) Additional Terms and Conditions

- a. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate emissions.
- b. This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.
- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- d. The permittee shall operate the baghouse whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a baghouse for the surface coating operation in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The baghouse shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the baghouse or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed



necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee has requested federally enforceable limitations on zinc coating processed and coating line operating hours for the purposes of limiting potential to emit to avoid major modification status and PSD review. Therefore:

a. the maximum amount of zinc coating processed in this emissions unit shall not exceed 1,453,715 pounds based upon a rolling, 12-month summation of the zinc coating throughput figures. To ensure enforceability during the first 12 calendar months of operation following the startup of emissions unit K010, the permittee shall not exceed the production levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production (Tons)</u>
1	272,880
1-2	545,760
1-3	818,640
1-4	1,091,520
1-5	1,364,440
1-6	1,453,715
1-7	1,453,715
1-8	1,453,715
1-9	1,453,715
1-10	1,453,715
1-11	1,453,715
1-12	1,453,715

After the first 12 calendar months of operation following the startup of emissions unit K010, compliance with the production rate limitation shall be based upon a rolling, 12-month summation of the production rate; and

b. the maximum number of operating hours for emissions unit K010 shall not exceed 3,840 hours as a rolling, 12-month summation. To ensure compliance during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative Operating Hours</u>
1-1	720
1-2	1,440
1-3	2,160
1-4	2,976
1-5	2,880
1-6	3,600
1-7	3,840
1-8	3,840
1-9	3,840



1-10	3,840
1-11	3,840
1-12	3,840

After the first 12 calendar months of operation following the startup of emissions unit K010, compliance with the annual limit on operating hours shall be based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baghouse, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the baghouse to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the baghouse while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the baghouse and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the baghouse was not in service when the emissions unit was in operation, as well as, a record of all operations during which the baghouse was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.



- (6) The permittee shall maintain monthly records of the following information:
- a. the total amount, in pounds, of zinc coating processed;
  - b. beginning after the first 12 calendar months following the startup of emissions unit K010, the rolling, 12-month summation of the total zinc coating processed, calculated by adding the current month's zinc coating processed to the zinc coating processed for the preceding eleven calendar months;
  - c. the total operating hours for each month;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the hours of operation; and
  - e. the updated, rolling 12-month summation for PM<sub>10</sub> emissions, calculated according to the equations in f)(1)b.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative zinc coating processed and the operating hours for each calendar month.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the baghouse was not in service (normal operation) when the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on zinc coating processed; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation. These reports shall be submitted in accordance with the reporting requirements the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:



Particulate emissions (PE)/emissions of particulate matter less than 10 microns (PM10) from the stack serving this emissions unit shall not exceed 0.0080 grains per dry standard cubic foot (gr/dscf).

**Applicable Compliance Method:**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 3 months after issuance of the permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for  $P_{M10}$ .
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
  - (a)  $PM_{10}$  emissions shall be determined according to 40 CFR Part 51, Appendix M, Method 201, or 40 CFR Part 51, Appendix M, 201A as appropriate.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.



- b. Emission Limitation:  
PE from emissions unit K010 shall not exceed 13.53 tons per year.

**Applicable Compliance Method:**

Compliance with the tons per year limit shall be demonstrated using the following equations:

maximum rate of 379 pounds of zinc coating processed per hour  
limited to 1,453,715 pounds of zinc coating processed per year  
maximum 3,840 hours of operation per year  
70% transfer efficiency (based on application information)  
95% capture efficiency (based on application information)  
baghouse control efficiency of 0.0080 gr/dscf (based on application information)

**Stack Emissions:**

(baghouse exhaust grain loading in gr/dscf) X (flow rate of baghouse in dscf/min)  
X (lb/7000 gr) X (60 min/hour) X (ton/2000 lbs) X (maximum hours of operation  
per year) = tons of PM<sub>10</sub> per rolling, 12-month period  
0.0080 X 20,000 X (1/7000) X 60 X (1/2000) X 3,840 = 2.63 tons per year

**Fugitive Emissions:**

Amount of zinc coating processed in pounds per hour X (70% capture efficiency)  
X (95% capture efficiency) = emission rate (pounds per hour)  
379 X (1-0.70) X (1-0.95) = 5.69 lbs/hr  
5.69 lbs/hr X 3,840 (maximum hours of operation) X (ton/2000 lbs) = 10.9 tons  
per year

**Total Emissions:**

2.63 tpy + 10.9 tpy = 13.53 tons per year

- c. Emission Limitation:  
PM<sub>10</sub> emissions from emissions unit K010 shall not exceed 13.53 tons based on  
a rolling, 12-month summation.

**Applicable Compliance Method:**

Compliance with the rolling, 12-month limit shall be demonstrated using the  
following equations:

maximum rate of 379 pounds of zinc coating processed per hour  
limited to 1,453,715 pounds of zinc coating processed based on a rolling, 12-  
month summation  
maximum 3,840 hours of operation per year  
70% transfer efficiency (based on application information)  
95% capture efficiency (based on application information)  
baghouse control efficiency of 0.0080 gr/dscf (based on application information)

**Stack Emissions:**

(baghouse exhaust grain loading in gr/dscf) X (flow rate of baghouse in dscf/min)  
X (lb/7000 gr) X (60 min/hour) X (ton/2000 lbs) X (maximum hours of operation  
per rolling, 12-month period) = tons of PM<sub>10</sub> per rolling, 12-month period



$0.0080 \times 20,000 \times (1/7000) \times 60 \times (1/2000) \times 3,840 = 2.63$  tons per rolling, 12-month period

**Fugitive Emissions:**

Amount of zinc coating processed in pounds per hour X (70% capture efficiency) X (95% capture efficiency) = emission rate (pounds per hour)

$379 \times (1-0.70) \times (1-0.95) = 5.69$  lbs/hr

$5.69 \text{ lbs/hr} \times 3,840$  (maximum hours of operation) X (ton/2000 lbs) = 10.9 tons per rolling, 12-month period

**Total Emissions:**

$2.63 \text{ tpy} + 10.9 \text{ tpy} = 13.53$  tons per rolling, 12-month period.

d. **Emission Limitation:**

No visible particulate emissions shall be emitted from the stack serving this emissions unit.

**Applicable Compliance Method:**

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

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.