



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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

12/15/2008

Wendy Myers
Precision Coating Systems, Inc.
948 Columbus Avenue
Marysville, OH 43040

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0180010167
Permit Number: P0103659
Permit Type: Initial Installation
County: Union

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	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 Journal 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 Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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 Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-CDO

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Precision Coating Systems, Inc.

Issue Date: 12/15/2008

Permit Number: P0103659

Permit Type: Initial Installation

Permit Description: Permit for a new spray booth (K006) to replace spray booth (K005) that was destroyed in a fire earlier this year.

Facility ID: 0180010167

Facility Location: Precision Coating Systems, Inc.
948 Columbus Ave,
Marysville, OH 43040

Facility Description: Automotive Body, Paint, and Interior Repair and Maintenance

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 Jennifer Carlin at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

- 1. Purpose of Application** - On July 9, 2008, Quantum Technologies & Systems, Inc., a paint job shop coating used automobiles, vinyl, and miscellaneous metal parts, submitted an application for the initial installation of a dry filter spray booth (ID No. K006) to replace an existing dry filter spray booth (ID No. K005) that was destroyed in a fire on March 13, 2008. The new spray booth will be coating plastic as well as metal parts, and the application states that usage of materials will be limited to 10 gallons per day when painting metal parts. Mr. Timothy McCarthy, P.E., the facility's consultant, clarified during a phone conversation on November 19, 2008 that the filters were dry filter material for the removal of particulate matter. In addition, he clarified that plastic parts included fiberglass parts, as described in the permit for booth K005. In conjunction with this application, Permit No. 01-08106 will be administratively modified to remove K005 and all reference to it in the facility-wide limits for hazardous air pollutants (HAPs). For further explanation, reference No. 4 below "Synthetic Minor Applicability."

Mr. McCarthy clarified in his email dated November 20, 2008 that the oven actually has "two burners which can operate independently as two separate ovens. These ovens are new, are internal to the booth, and are used as primary ovens. The burners can also be set to operate together as one oven if desired." Because of this new description, the permit will indicate that the spray booth has *two* internal natural gas-fired drying ovens.

Finally, Mr. McCarthy stated in his email dated November, 24, 2008 that the correct legal name of the facility is Precision Coating Systems, Inc., and that this should continue to be the name on the listed on the permit.

- 2. Applicable Regulations** - The following regulations are applicable to this facility:

OAC rule 3745-17-07(A)(1) "Visible Particulate Emission Limitations for Stack Emissions" – This regulation

is applicable to the new spray booth (K006). The regulation states that "visible particulate emissions from any stack shall not exceed twenty percent opacity as a six-minute average." The spray booth will be equipped with dry filters to minimize particulate matter and visible emissions. No visible emissions complaints were noted in the file regarding this facility. Compliance with this rule is expected.

OAC rule 3745-17-11(C) "Requirements for Surface Coating Processes" - This rule is applicable to the spray booth K006 and outlines work practice standards, recordkeeping, inspection and maintenance requirements for coating operations. For spray booths, it specifically addresses operating and maintaining the dry filter system.

OAC rule 3745-21-07(G)(2) "Operations using Liquid Organic Material" - This regulation is applicable to the new spray booth (K006) and states that the facility shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour of photochemically reactive material or substance containing such photochemically reactive material, unless aid discharge has been reduced by at least eighty five percent. The eight pounds per hour and forty pounds per day emissions restrictions of this rule, however, shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current OAC rule 3745-21-07 as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, these emission limitations and the associated monitoring, record keeping, reporting, and testing requirements shall be void.



OAC rule 3745-31-05(A)(3) "BAT" - BAT is not required for particulate since the potential particulate emissions are less than 10 tons per year. For VOC emissions, the maximum hourly usage rate for spray booth K006 is 2 gallons of coating per hour which results in maximum VOC emissions of 13.22 pounds per hour. The facility is limiting the coating usage to 10,000 gallons per year which results in annual VOC emissions of 34.1 tons per year. This results in low enough emissions to avoid a BAT cost effectiveness analysis.

OAC rule 3745-31-05(D) "Special Terms and Conditions Including Federally Enforceable Limitations on Potential to Emit" - According to the Permit Strategy Write-Up for Permit No. 01-08106, the facility was permitted as synthetic minor for individual and total HAPs. With this application, the facility will also be permitted as synthetic minor for VOCs, although no increase in potential emissions is included in this application. The addition of the synthetic minor for VOCs comes as a clarification was made by the facility's consultant that the 5000 gallons per year limit per spray booth included on the previous permit application for Permit No. 01-08106 is not a true source maximum capacity, but a voluntary limit on capacity, which therefore constitutes a synthetic minor restriction. Without this 5000 gallon per year per booth limit, potential facility-wide VOC emission are 290 tons per year, and with the limit, potential VOC emissions are reduced to 87 tons per year facility-wide (source potential: 16.53 tons per booth and 4.35 tons for P001). The facility, however, wishes to take the same facility-wide limit on VOCs that they have for HAPs which is a facility-wide limit of 10,000 gallons per year, which would effectively limit VOC emissions to 34.1 tons per year, and remain consistent with the current permit for the four other existing spray booths (K001-K004) at the facility. The 5000 gallons per year limit for K006 will be included in the permit as a monthly limit of 417 gallons per year to be consistent with the limits included in Permit No. 01-08106 for the other four existing booths at the facility. Based on the facility's history and reported emissions levels, compliance with this regulation is expected.

OAC rule 3745-114 "Toxic Air Contaminants" - The applicant submitted a Screen3 model run for spray booth K006 for a maximum usage emission rate of 2.44 pounds per hour of xylene (worst case toxic modeled). Page 5 of the modeling summary submitted with the application also shows modeled maximum concentrations for methyl isobutyl ketone (MIBK) and toluene as well. All appear to be in compliance with the respective TLVs. A toxics condition will be included in the permit outlining the parameters and results of the modeling submitted.

The following regulations are not applicable to this facility:

OAC rule 3745-21-09 "Control of Emissions of Volatile Organic Compounds from Stationary Sources..." This regulation, including part (HH), specifically for surface coating of automotive/transportation parts and part (U), specifically for miscellaneous metal parts and products, is not applicable to the spray booth since it is not at a facility located in one of the listed applicable counties in the regulation (as listed in part (A) Applicability) and does not have the potential to emit more than 100 tons per year of volatile organic compounds (VOC) (as stated in parts (A)(a) and(A)(b)). This regulation is included in the previous permit for the facility (Permit No. 01-08106) but will not be included in this permit. Because this regulation is not applicable, the request to limit coating usage to 10 gallons per day when coating metal parts is not necessary (exemption threshold stated in (U)(2)(e)(iii) of this rule) and will not be included in this permit.

- 3. NSPS/NESHAP/MACT/112r Applicability** – These NSPS, NESHAP, MACT, PSD, and 112r are not applicable to this facility.

A new national emission standard, 40 CFR 63, Subpart HHHHHH "National Emission Standards for



Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources,” has been finalized, and this facility may be subject, but at the current time, based on MSDS submitted, does not appear to be using materials containing the target HAP which is methylene chloride (MeCL).

4. **Synthetic Minor Applicability/Netting Determination** – This facility is synthetic minor and has previously taken federally enforceable limits on individual and total HAPs, limiting the facility potential to emit (PTE) to less than 10 and 25 tons per year, respectively. A facility- wide HAP limit, which included sources K001-K005 and P001, was incorporated into Permit No. 01-08106 issued July 20, 2000. Because spray booth K005 is no longer at the facility and is being replaced by spray booth K006, Permit No. 01-08106 will be administratively modified to remove K005 and all references to it in applicable permit conditions, including the synthetic minor condition, and reference to K006 will be added to the associated facility-wide limitations. In addition, the same facility-wide limitations will be included in Permit No. P0103659, the new Permit to Install and Operate (PTIO) for K006. The facility has requested to limit facility-wide VOC emissions to 34.1 tons per year by taking a limit of 10,000 gallons of coating per year. Maximum coating usage per hour is 2 gallons per hour and the highest coating VOC content is 6.61 pounds per gallon, as applied. See Emissions Calculations below.
5. **Prevention of Significant Deterioration** - PSD is not applicable to this facility. This facility is considered a minor facility per PSD. Union County is in attainment.
6. **Emissions**

Facility-wide PTE

$$5 \text{ booths} * 2 \text{ gal/hr} * 6.61 \text{ lb/gal} * 8760 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lbs} = 290 \text{ tpy}$$

Facility-wide Coating usage

Maximum VOC content, as applied = 6.61 lb/gal

Maximum coating usage = 2 gal/hr

6.61 lb/gal * 2 gal/hr = 13.22 lb/hr

6.61 lb/gal * 10,000 gallons * 1 ton/2000 lbs = 33.05 tpy

Facility-wide clean-up solvent usage

Maximum VOC content, as applied 6.99 lb/gal

300 gal/yr * 6.99 lb/gal * 1 yr/2080 hrs = 1.01 lb/hr (conservatively)

300 gallons * 6.99 lb/gal * 1 ton/2000 lbs = 1.05 tpy

33.05 tpy + 1.05 tpy = 34.10 tpy VOC

Requested allowable emissions correspond to the application which states that no more than 5000 gallons will be used at any one booth, which is half of the facility-wide maximum of 10,000 gallons (the synthetic minor limit).

Pollutant	Emissions Before Control (lb/hr)	Actual Emission (lb/hr)	Actual Emission (tons/yr)	Requested Allowable (lb/hr)	Requested Allowable (tons/yr)
PM	NA	NA	0.10	NA	0.10
PM-10	NA	NA	0.10	NA	0.10
SO2	0.01	0.001	0.01	0.001	0.01
NOx	0.199	0.199	0.87	0.199	0.87
VOC	13.22	13.22	17.85	13.22	17.85
CO	0.042	0.042	0.18	0.042	0.18



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0103659
Facility ID: 0180010167

Highest Individual HAP	2.44	2.44	3.05	2.44	3.05
Total HAP	5.94	5.94	7.43	5.94	7.43

7. **Recommendation** – The issuance of Permit No. P0103659 is recommended.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Precision Coating Systems, Inc.

Facility ID: 0180010167
Permit Number: P0103659
Permit Type: Initial Installation
Issued: 12/15/2008
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
Precision Coating Systems, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103659

Facility ID: 0180010167

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0180010167

Application Number(s): A0035561, A0036421

Permit Number: P0103659

Permit Description: Permit for a new spray booth (K006) to replace spray booth (K005) that was destroyed in a fire earlier this year.

Permit Type: Initial Installation

Permit Fee: \$200.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 12/15/2008

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:

Precision Coating Systems, Inc.
948 Columbus Ave
Marysville, OH 43040

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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0103659

Facility ID: 0180010167

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0103659

Permit Description: Permit for a new spray booth (K006) to replace spray booth (K005) that was destroyed in a fire earlier this year.

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

Emissions Unit ID:	K006
Company Equipment ID:	Booth #6
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: P0103659

Facility ID: 0180010167

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 Ohio EPA DAPC, Central District Office 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: P0103659

Facility ID: 0180010167

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103659

Facility ID: 0180010167

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) C.1.b)(1)e.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103659

Facility ID: 0180010167

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K006, Booth #6

Operations, Property and/or Equipment Description:

One spray booth (K006, booth #6) with two internal natural gas-fired drying ovens (one million Btu per hour, each), coating miscellaneous metal or plastic parts, with HVLP spray gun and dry filters

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. C.1.b)(1)f.

(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
a.	OAC rule 3745-17-07(A)(1)	Visible emissions from any stack shall not exceed twenty percent opacity as a six minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(C)	See Section C.1.b)(2)b and(2)c
c.	OAC rule 3745-21-07(G)	Photochemically reactive organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day. See Section C.1.b)(2)d. below.
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from K006 shall not exceed 13.22 pounds per hour. Volatile organic compound emissions shall not exceed 16.53 tons per year from coatings materials employed in K006. The requirements of this rule also include



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		compliance with the requirements of OAC rule 3745-31-05(D).
e.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Hazardous air pollutant (HAP) emissions from K001-K004, K006 and P001 shall not exceed, as a rolling 12-month summation, 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and cleanup material usage. Volatile organic compound (VOC) emissions from K001-K004, K006 and P001 shall not exceed, as a rolling 12-month summation, 34.1 tons per year from coating and cleanup material usage.
f.	OAC rule 3745-114	See Section C.1.d)(10), (11), and (12)

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

[OAC rule 3745-17-07(A)(1)]
- b. 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.

[OAC rule 3745-17-11(C)]
- c. The Permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)]; [OAC rule 3745-31-05(D)]
- d. The organic compounds (OC) emission limitations of 8 pounds per hour and 40 pounds per day shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current OAC rule 3745-21-07 as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, these emission limitations and the associated monitoring, record keeping, reporting, and testing requirements shall be void.
- e. The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 9.9 tons and 24.9 tons per year,



respectively, by limiting the coating gallon usage of K001-K004, K006 and P001 to less than 10,000 gallons per year.

- f. The facility-wide volatile organic compound (VOC) emissions are effectively limited to less than 34.1 tons per year, respectively, by limiting the coating gallon usage of K001-K004, K006 and P001 to less than 10,000 gallons per year.
- g. The maximum annual total coating usage for K001-K004, K006 and P001 shall not exceed 10,000 gallons based upon a rolling monthly summation of the coating usage figures.

c) Operational Restrictions

- (1) The Permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the Permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(2)(b)]; [OAC rule 3745-31-05(D) or (E)]

- (2) The Permittee shall expeditiously repair the dry particulate filter 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.

[OAC rule 3745-17-11(C)(2)(e)]

- (3) Coating usage shall not exceed 417 gallons per month for K006.

d) Monitoring and/or Recordkeeping Requirements

- (1) The Permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, 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.

[OAC 3745-17-11(C)(2)(a)]

- (2) The Permittee shall conduct periodic inspections of the dry particulate filter 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.

[OAC rule 3745-17-11(C)(2)(c)]

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the Permittee shall conduct a comprehensive inspection of the dry particulate filter



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.

[OAC rule 3745-17-11(C)(2)(c)]

- (4) The Permittee shall document each inspection (periodic and annual) of the dry particulate filter system 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 the 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.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (5) The Permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter 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.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

- (6) The Permittee shall collect and record the following information for each day for the coating operation:
- a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and



photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of Aphotochemically reactive[®] and Anonphotochemically reactive[®] are based upon OAC rule 3745-21-01(C)(5).]

[OAC rule 3745-21-07(G)(2)]

- (7) The Permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
- (8) The Permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the VOC emission from sections C.1.d)(7)e for the calendar year), in tons, for K006.
- (9) The Permittee shall maintain monthly records of the following for emissions units K001-K004, K006 and P001:
 - a. the company identification of each coating and cleanup material employed;
 - b. the total number of gallons of each coating and cleanup material employed;
 - c. the volatile organic compound (VOC), individual hazardous air pollutant (HAP), and total HAP content of each coating and cleanup material employed, in pounds per gallon;
 - d. the VOC, individual HAP, and total HAP emissions from each coating and cleanup material employed, in pounds;
 - e. the total VOC, individual HAP, and total HAP emissions from the emission units for all coatings and cleanup materials employed, in pounds;
 - f. the updated rolling, 12-month summation of the total VOC individual HAP, and total HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.



- g. the total gallons of all coatings and cleanup materials employed for all coatings and cleanup materials employed; and,
 - h. the updated rolling, 12-month summation for usage of all coatings and cleanup materials employed, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
- (10) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit, spray booth K006, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the Permittee. The ΔToxic Air Contaminant Statute, ORC 3704.03(F), was applied to this emissions unit 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 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 ΔReview of New Sources of Air Toxic Emissions, Option A, 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 emitted from the emissions unit, (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) ΔThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) ΔThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; 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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 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):

$$TLV/10 \times 8/24 \times 5/7 = 4 TLV/XY = MAGLC$$



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

Toxic Contaminant: xylene

TLV (mg/m³): 434 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 95

MAGLC (ug/m³): 10,338

Toxic Contaminant: toluene

TLV (mg/m³): 188 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 89

MAGLC (ug/m³): 1,794

Toxic Contaminant: methyl isobutyl ketone

TLV (mg/m³): 590 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 89

MAGLC (ug/m³): 14,048

The Permittee, has demonstrated that emissions of xylene, toluene, and methyl isobutyl ketone from emissions unit K006, are 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 Toxic Air Contaminant Statute, ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (11) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, 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 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 FEPTIO 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (12) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70



e) Reporting Requirements

- (1) The Permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-21-07(G)(2)]

- (2) 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. HAP emissions limitation outlined in b)(2)e., and;
 - ii. VOC emissions limitation outlined in b)(2)f.
 - 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).

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).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- (3) The Permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, monthly coating usage limitation.



[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- (4) 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.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

- (5) The Permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual permit evaluation report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01],

f) Testing Requirements

- (1) Compliance with the emission limitation shall be determined in accordance with the following methods:

a. Emissions Limitation

VOC emissions shall not exceed 13.22 lbs/hr, excluding cleanup solvent usage

Applicable Compliance Method

The hourly emission rate was derived from the maximum coating application rate and maximum coating solvent content (as applied) as follows: 2.0 gal/hr * 6.61 lbs VOC/gal = 13.22 lbs VOC/hr

b. Emissions Limitation:

The maximum annual coating usage for K001-K004, K006, and P001 shall not exceed 10,000 gallons of coating based on a rolling, 12-month summation of monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the calendar year.

c. Emissions Limitation:

Volatile organic compound (VOC) emissions from K001-K004, K006 and P001 shall not exceed 34.1 tons of VOC per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method



Compliance shall be demonstrated by record keeping in C.1.d)(9), above.

d. Emissions Limitation

Facility-wide emissions shall not exceed 9.9 of an individual HAP and 24.9 tons total combined HAPs per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be demonstrated by record keeping in C.1.d)(9), above.

e. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

g) Miscellaneous Requirements

(1) None.