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Facility Name: **Ebner Furnaces, Inc.**

Application Number: **16-1790**

Date: **Draft PTI (Date to be entered upon final issuance)**

### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

#### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### **CONSTRUCTION OF NEW SOURCES**

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **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.

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### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **BEST AVAILABLE TECHNOLOGY**

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

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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**AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Ebner Furnaces, Inc.** located in **Medina** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Cont'd</u>	<u>Source Identification Description</u>
R001		Coating non-metal parts-coating line 1A
	K001 (Mod) Cont'd	
K001 (Mod)		Coating metal parts-coating line 1

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		<u>BAT Determination</u>		<u>Applicable Federal &amp; OAC Rules</u>
		Compliance with the terms and conditions of this permit and with the Air Toxics Policy. The permittee shall employ methods to eliminate or minimize particulate emissions	Compliance with the Permit Allowable Mass Emissions and Control and Usage Requirements, with the terms and conditions of this permit, and with the Air Toxics Policy. The permittee shall employ methods to eliminate or minimize particulate emissions.	3745-31-05 (A) (3)
				3745-31-05 (D) and 3745-35-07 (B) (1)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-21-07(G) (9) (c)	3745-21-09 (U)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	volatile organic compounds (VOC) per day for coatings	See II.A.2 of the Additional Special Terms and Conditions.
3745-31-05(A) (3)		14.2 pounds of organic compounds (OC) per hour for coating	13.7 TPY VOC for coatings and cleanup materials	
3745-21-09 (U) (2) (f)		2.1 TPY OC for coatings, as a rolling 12-month summation	7.0 tons of any individual hazardous air pollutant (HAP) per year, based upon a rolling, 12-month summation for R001 and K001 (See Additional Special Terms and Conditions I.A.2 and II.A.1)	
3745-31-05(D) and 3745-35-07(B) (1)		5000 gallons coating based on a rolling 12-month summation		
		7.0 tons of any individual hazardous air pollutant (HAP) per year, based upon a rolling, 12-month summation for R001 and K001 (See Additional Special Terms and Conditions I.A.2. and II.A.1. See also I.F.2.).		
		See I.A.1 in the Additional Special Terms and Conditions below.		
		69.7 pounds of	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents for any coating that is dried at temperatures not exceeding two hundred degrees Fahrenheit	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC*	15.8**
HAP	7.0 based on a rolling 12-month summation

\* OC emissions includes VOC emissions.

\*\* Increase in VOC emissions of 9.27 TPY for K001.

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### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Regional Air Quality, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **I. Coating Line 1A (R001)**

#### **A. Additional Terms and Conditions**

1. The permittee shall only employ materials that meet the following requirements:

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- a. the volatile content of such material consist only of water and liquid organic material;
  - b. the liquid organic material comprises not more than twenty per cent by volume of said volatile content; and,
  - c. the volatile content is not a photochemically reactive material.
2. The emissions of any individual hazardous air pollutant (HAP) from emissions units K001 and R001 shall not exceed 7.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of any individual HAP (Tons)</u>
1	0.6
1-2	1.2
1-3	1.8
1-4	2.3
1-5	2.9
1-6	3.5
1-7	4.1
1-8	4.7
1-9	5.3
1-10	5.8
1-11	6.4
1-12	7.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

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## **B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 5000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	417
1-2	833
1-3	1250
1-4	1667
1-5	2083
1-6	2500
1-7	2917
1-8	3333
1-9	3750
1-10	4167
1-11	4583
1-12	5000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The OC content of the coating shall not exceed 0.834 pound of OC per gallon of coating.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following records for each material employed in this emissions unit to demonstrate that the material complies with OAC rule 3745-21-07(G)(9)(c):

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- a. the identification of each volatile ingredient for each material employed;
  - b. the percent of liquid organic material by volume of said volatile content;
  - c. the percent of water by volume of said volatile content; and,
  - d. documentation that the volatile content is not a photochemically reactive material as defined in OAC rule 3745-21-01(C) (5).
2. The permittee shall maintain monthly records of the following information:
- a. the name and identification number of each coating employed;
  - b. the OC content of each coating, in pound(s) per gallon;
  - c. the coating usage for each month;
  - d. the OC emission rate from all coatings, in tons per month (i.e., the sum of (b) time (c) for each coating, then divided by 2000); and,
  - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures and the rolling, 12-month summation of the OC emissions.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage and the cumulative OC emissions for each calendar month.

3. The permittee shall collect and record the following information each month for emissions units K001 and R001:
- a. The name and identification number of each coating, as applied.

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- b. The individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
- c. The number of gallons of each coating employed.
- d. The name and identification of each cleanup material employed.
- e. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
- f. The number of gallons of each cleanup material employed.
- g. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times c for each coating and the sum of e times f for each cleanup material).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage and the cumulative emissions of each individual HAP for each calendar month.

<sup>1</sup>A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

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- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. 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 the permit. Such records may be maintained in computerized form.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the coating line employed a material that does not comply with OAC rule 3745-21-07(G)(9)(c). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of a coating which exceeds the 0.834 pounds of OC per gallon of coating limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following the issuance of

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this permit, all exceedances of the maximum allowable cumulative coating usage levels.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emissions of any individual HAP levels.
5. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit required reports in the following manner:
  - a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Emission Summary of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation

the volatile content consist only of water and liquid organic material

the liquid organic material comprises not more than twenty per cent by volume of said volatile content

the volatile content is not a photochemically reactive material

Applicable Compliance Method

Compliance with the emission limitation shall be determined using formulation data or USEPA Method 24 to determine the organic compound contents of the coatings and recording the information required in Section I.C.1 of the Additional Terms and Conditions of this permit.

- b. Emission Limitation

14.2 pounds of OC per hour

Applicable Compliance Method

Compliance with the emission limitation is based on the worst-case scenario. The worst-case scenario is assuming that the solvent in the 17 gallons of coating is all evaporated during the one hour curing process (i.e. 17 gallons of coating times 16.68 pounds per gallon times 0.05 pound of OC per pound of coating = 14.2 pounds of OC per hour). Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings

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c. Emission Limitation

2.1 TPY OC, based upon a rolling 12-month summation

Applicable Compliance Method

Multiply the OC content, in pounds per gallon, by the maximum allowable gallons of coating, then divided by 2000.

d. Emission Limitation

7.0 tons of individual HAP per year, based upon a rolling, 12-month summation

Applicable Compliance Method

Monthly recordkeeping of the coating and cleanup material usage and the individual HAP content of each coating and each cleanup material.

Formulation data shall be used to determine the individual HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the TSCREEN model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling

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for each pollutant:

Pollutant: ethylene glycol

TLV (mg/m3): 73.7

Maximum Hourly Emission Rate (lbs/hr): 16.3\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 1494.9

MAGLC (ug/m3): 1754.76

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a

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listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

\*The maximum hourly emission rate was based on the worst-case scenario for R001 plus the increase in allowable mass emissions for K001.

2. The coating usage limitation in these Terms and Conditions will sufficiently demonstrate that the combined HAPs emissions have not exceed 25 tons per year.
3. In accordance with OAC rule 3745-31-05(D) and OAC rule 3745-35-07(B)(1), sections I.A, I.B., I.C.1, I.C.2, I.C.3, I.C.5, I.D, E.1.a, E.1.c, and E.1.d of these terms and conditions constitute the federally enforceable portions of this permit.

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## II. Coating Line 1 (K001)

### A. Additional Terms and Conditions

1. The emissions of any individual hazardous air pollutant (HAP) from emissions units K001 and R001 shall not exceed 7.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of any individual HAP (Tons)</u>
1	0.6
1-2	1.2
1-3	1.8
1-4	2.3
1-5	2.9
1-6	3.5
1-7	4.1
1-8	4.7
1-9	5.3
1-10	5.8
1-11	6.4
1-12	7.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

2. All coatings shall have no more than 3.5 pounds of VOC per gallon of coating (excluding water and exempt solvent or less, as applied), except for when using of Red Hot Aluminum.
3. To meet the exemption allowed by OAC rule 3745-21-09(U)(2)(f) when using Red Hot Aluminum, the permittee shall comply with the following:

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- a. Each day when Red Hot Aluminum is used, no more than 3.0 gallons of any coating shall be employed. The VOC content of the Red Hot Aluminum coating shall not exceed 5.36 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied.
- b. The monthly volume-weight average VOC content of all coatings shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- c. Each year the permittee shall submit to Akron Local Air Agency the following information:
  - i. A request for quotation (RFQ) on the availability of coatings that meet the following two (2) criteria:
    - aa. VOC content is 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents or less, as applied.
    - ab. Coating shall be able to withstand and not discolor when exposed to temperatures in excess of 1600 degrees Fahrenheit.
  - ii. This RFQ shall be sent to three (3) different coating vendors and their written response(s) shall be submitted to Akron Local Air Agency.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon as applied;

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- d. the VOC content of each coating, in pounds per gallon as applied; and,
    - e. the VOC emission rate, in pounds per day (i.e., the sum of (b) times (d) for each coating).
  2. The permittee shall collect and record the following information each month for the coating line:
    - a. the name and identification number of each cleanup material employed;
    - b. the volume, in gallons, of each cleanup material employed;
    - c. the VOC content of each cleanup material, in pounds per gallon;
    - d. the VOC emission rate, in tons per month (i.e. the sum of (b) times (c) for each cleanup material, then divided by 2000); and,
    - e. the monthly volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of rule 3745-21-10 of the Administrative Code for Cvoc,2.
  3. The permittee shall collect and record the following information each month for emissions units K001 and R001:
    - a. The name and identification number of each coating, as applied.
    - b. The individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
    - c. The number of gallons of each coating employed.
    - d. The name and identification of each cleanup material employed.
    - e. The individual HAP content for each HAP of each

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cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.

- f. The number of gallons of each cleanup material employed.
- g. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times c for each coating and the sum of e times f for each cleanup material).

<sup>1</sup>A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- 5. 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 the permit. Such records may be maintained in computerized form.

#### **D. Reporting Requirements**

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1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than three gallons of coatings on days when the Red Hot Aluminum coating is employed. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings that is not specified in section A.II.2 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the deviation.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the monthly volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
4. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 69.7 lbs/day, and the actual daily VOC emissions for each such day.
5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emissions of any individual HAP levels.
6. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
7. The permittee shall annual reports as described in Section II.A.2 of these terms and conditions. These reports shall be submitted by January 31 of each year.

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

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Emission Summary of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation
    - 3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents
    - 5.36 lbs of VOC per gallon of coating, excluding water and exempt solvents for Red Hot Aluminum

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Applicable Compliance Method

OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation

69.7 lbs of VOC per day for coatings

Applicable Compliance Method

Daily recordkeeping of the coating usage and VOC content of each coating. USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings.

c. Emission Limitation

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Applicable Compliance Method

Daily recordkeeping of the coating usage and the VOC content of each coating. USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings. Monthly recordkeeping of the cleanup material usage and the VOC content of each cleanup material. Formulation data shall be used to determine the VOC contents of the cleanup materials.

d. Emission Limitation

7.0 tons of individual HAP per year, based upon a rolling, 12-month summation

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Applicable Compliance Method

Monthly recordkeeping of the coating and cleanup material usage and the individual HAP content of each coating and each cleanup material. Formulation data shall be used to determine the individual HAP contents of the coatings and cleanup materials.

e. Emission Limitation

3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents as a monthly volume-weighted average

Applicable Compliance Method

Monthly and daily recordkeeping as required in sections II.C.1 and II.C.2 of these terms and conditions. OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and

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is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the TSCREEN model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ethylene glycol

TLV (mg/m3): 73.7

Maximum Hourly Emission Rate (lbs/hr): 16.3\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1494.9

Pollutant: VM&P naptha

TLV (mg/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 642.0

MAGLC (ug/m3): 32619.0

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Pollutant: 2-ethoxyethyl acetate

TLV (mg/m3): 27

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 642.0

MAGLC (ug/m3): 642.9

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 642.0

MAGLC (ug/m3): 4881.0

Pollutant: ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 642.0

MAGLC (ug/m3): 10333.3

Pollutant: butanol

TLV (mg/m3): 112

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 642.0

MAGLC (ug/m3): 2666.7

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Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 642.0

MAGLC (ug/m3): 10333.3

Pollutant: butoxyethanol

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 2.1\*\*

Predicted 1-Hour Maximum Ground-Level Concentration  
(ug/m3): 642.0

MAGLC (ug/m3): 2881.0

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

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- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

\*The maximum hourly emission rate was based on the worst-case scenario for R001 plus the increase in allowable mass emissions for K001.

\*\* Increase in the allowable mass emission rate.

- 2. In accordance with OAC rule 3745-31-05(D) and OAC rule 3745-35-07(B) (1), sections II.A, II.C.1, II.C.2,

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II.C.3, II.C.5, II.D, II.E.1.a, II.E.1.d, and II.E.1.e  
of these terms and conditions constitute the federally  
enforceable portions of this permit.