State of Ohio Environmental Protection Agency

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

3/2/2009

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WILLIAM MULL
MULL IRON
10 MULL DR
RITTMAN, OH 44270

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285020433
Permit Number: P0086489
Permit Type: Renewal
County: Wayne

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 Daily Recorder. 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

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, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

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

Permit Strategy Write-Up

1. Check all that apply:

   __X__ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:
   Mull Iron spray paints large structural steel beams and components at their facility in Rittman, Wayne County. The facility operates one paint booth. The spray painting operation is a batch process. There are no ovens associated with the current painting process and the structural steel beams and components are all air dried.

3. Facility Emissions and Attainment Status:
   The facility is located in Wayne County, which is currently attainment for all criteria pollutants. The facility emits PE, OC/VOCs and HAPs from one spray coating line.

   The facility wide Potentials to Emit (PTE) for PE, OC/VOCs and HAPs will be limited below the Title V thresholds by federally enforceable limits. The facility requested federally enforceable limits in order to maintain the PTE for OC/VOCs and HAPs below the established threshold limits for Title V.

4. Source Emissions:
   K001 is a paint spray booth equipped with a electrostatic spray gun and a dry filtration system. The coatings are all air dried and are not photochemically reactive, according to OAC rule 3745-21-01(C).

5. Conclusion:
   The permit includes federally enforceable limits for the coating OC/VOC emissions, and coating HAP emissions, as a rolling 12-month summation and the associated recordkeeping and reporting requirements. The limits requested by the facility are sufficient to reduce the facility's PTE for OC/VOCs and HAPs below the established Title V thresholds

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
PE	9.9
HAP	9.9
OC/VOC	10.8

Wayne County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
MULL IRON

Issue Date: 3/2/2009
Permit Number: P0086489
Permit Type: Renewal
Permit Description: Structural Metal Spray Coating Operation
Facility ID: 0285020433
Facility Location: MULL IRON
10 MULL DR,
RITTMAN, OH 44270
Facility Description: All Other Specialty Trade Contractors

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 Richard Smith at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
MULL IRON

Facility ID: 0285020433
Permit Number: P0086489
Permit Type: Renewal
Issued: 3/2/2009
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
MULL IRON

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Authorization

Facility ID: 0285020433
Application Number(s): A0017237
Permit Number: P0086489
Permit Description: Structural Metal Spray Coating Operation
Permit Type: Renewal
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 3/2/2009
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:

MULL IRON
10 MULL DR
RITTMAN, OH 44270

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

Authorization (continued)

Permit Number: P0086489
Permit Description: Structural Metal Spray Coating Operation

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Metal coating
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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, Northeast 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.

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.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Metal coating

Operations, Property and/or Equipment Description:

structural metal spray coating operation

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. b)(2)e, d)(5), d)(6), d)(7), d)(8), e)(2)c and e)(2)d

(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. b)(2)c, c)(1), d(1)h, d)(1)l, e)(2)e and e)(2)f

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 3745-17-11(C)	See b)(2)g, b(2)h, c)(2), c)(3), d)(9), d)(10), d(11), d)(12), d)(13) and e)(5) below.
b.	OAC rule 3745-31-05(A)(3) (PTI 02-22823)	Volatile organic compounds (VOC) emissions shall not exceed 9.70 lbs/hr from all coatings. VOC emissions shall not exceed 10.8 tons per year from all materials employed.
c.	OAC rule 3745-31-05(D)	See b)(2)c and c)(1) below.
d.	OAC rule 3745-31-05(E)	Particulate emissions (PE) shall not exceed 9.9 tons per year. See b)(2)f below.
e.	OAC rule 3745-21-09(U)	See b)(2)a below.
f.	OAC rule 3745-17-08	See b)(2)d below.
g.	ORC 3704.03(F)(4)(c)	See e)(3) below.
h.	OAC rule 3745-114	See b)(2)e below.
i.	40 CFR Part 63, Subpart HHHHHH	See b)(2)b below.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH and Subpart A, General Provisions. The facility may be subject as an area source with a compliance date as specified in 40 CFR 63.11172.

c. Pursuant to OAC rule 3745-31-05(D), total emissions from emissions units K001 shall not exceed 9.9 tons per year of each single hazardous air pollutant (HAP), and 10.8 tons per year of total combined HAP, based upon a rolling, 12-month summation. Single HAP content of each coating shall not exceed 3.22 pounds per gallon. Combined HAP content of each coating shall not exceed 3.5 pounds per gallon. All cleanup material employed shall be considered as a single HAP.

d. According to OAC rule 3745-17-08(A)(1) this emissions unit is not subject to fugitive particulate emissions limits because the facility is located in Wayne County.

e. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the director has establish, per ORC 3704.03(F)(4)(c), a limit for toluene, which shall not exceed 42 pounds per day, and a limit for xylene, which shall not exceed 84 pounds per day.

f. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (24 hrs/day), by the emission rate modeled based upon an hourly coating usage of 2.77 gallons per hour (to determine the ground level concentration).

Permit to Install 02-22823 for this air contaminant source takes into account the restricted annual coating usage, (i.e., 6,156 gallons), solids content, (i.e., 9.19 lbs solids/gallon coating), and solids transfer efficiency for electrostatic coating equipment, (i.e., 65%), as voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

g. 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.

h. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 6,156 gallons, as a rolling, 12-month summation. The maximum annual clean-up material usage (dispensed minus recovered for disposal) for this emissions unit shall not exceed 20 gallons, as a rolling, 12-month summation. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

(2) The permittee shall operate and maintain the 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.

(3) 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.

d) 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 VOC content (excluding water and exempt solvents) of each coating, in lbs/gal as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed];

e. the total number of hours this emissions unit was in operation;

f. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (e)];

g. the solids content of each coating;

h. the single HAP content of each coating, in lbs/gal, as applied; and

i. the combined HAP content of each coating, in lbs/gal, as applied.

(2) The permittee shall collect and record the following cleanup material information for each month for this emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) times (c) for each cleanup material employed];

e. the amount of cleanup material recovered, in pounds;

f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) – {(e) times (c)}]; and

g. the total annual cleanup material usage, in gallons, as a rolling, 12-month summation [i.e., the sum of (b) for this month and the previous 11 months].

(3) The permittee shall collect and record each month the total coating material usage, in gallons, as a rolling, 12-month summation [i.e., the sum of the daily records in (d)(1)c for this month and the previous 11 months].

(4) The permittee shall calculate and record total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in d)(1) plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(2)].

(5) In order to verify that the emissions of toluene and xylene do not exceed the daily allowable, 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 toluene and xylene content (excluding water and exempt solvents) of each coating, in lbs/gal, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

d. the daily toluene and xylene emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed].

(6) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 3.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8,824

MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 1.75

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,412

MAGLC (ug/m3): 4,476

The permittee, having demonstrated that emissions of toluene and xylene, from emissions unit K001, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

(7) 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 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 "Toxic 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 ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled

level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

(8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

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 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 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 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.

(9) 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 Ohio EPA Northeast District Office upon request.

(10) 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 Northeast District Office upon request.

(11) 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.

(12) 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 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 Ohio EPA Northeast District Office upon request.

(13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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 Northeast District Office upon request.

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation reports that identify:

a. each day the VOC emissions exceeded the hourly emission limit specified above and the actual hourly VOC emissions during that day;

b. any exceedence of the rolling, 12-month coating and cleanup material usage limitation from emissions units K001 and the actual coating and cleanup material usage during the period;

c. any exceedance of the daily limitation on toxic air emissions, as established by the director in order to maintain any toxic air contaminant below its MAGLC;

d. any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrate compliance with the "Toxic Air Contaminant Statute";

e. any exceedance of the single HAP content limitation, and the actual single HAP content and number of gallons of the coating employed; and

f. any exceedance of the combined HAP content limitation, and the actual combined HAP content and number of gallons of the coating employed.

The quarterly deviation reports shall be submitted to the Director (the Ohio EPA Northeast District Office) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

(3) The permittee shall submit annual compliance reports that include:

a. a list of all allowable emission limitations and operational restrictions in b)(1), b)(2) and c)(1); and

b. a statement whether the emissions unit is in compliance with the requirements listed.

The report shall be submitted to the Director (the Ohio EPA Northeast District Office) by February 1 of each year and shall cover the previous calendar year.

(4) The permittee shall submit annual reports that document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

(5) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days after the event occurs.

(6) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

VOC emissions shall not exceed 9.70 lbs/hr as a daily average from all coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

VOC emissions shall not exceed 10.8 tons per year from all materials employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4).

d. Emission Limitation:

Total emissions from emissions units K001 shall not exceed 9.9 tons per year of each single HAP, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3) and the following equation:

Annual single HAP = [(CT x sHAP) + (CM)] x (ton/2000 lbs)

where:

CT = the actual gallons of coating employed per year, not to exceed 6,156;

sHAP = the actual single HAP content of the coatings, in pounds per gallon, not to exceed 3.22 lbs/gal; and

CM = the actual pounds of cleanup material employed, assumed to be 100% single HAP, the yearly summation from d)(2).

e. Emission Limitation:

Total emissions from emissions units K001 shall not exceed 10.8 tons per year of total combined HAP, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3) and the following equation:

Annual combined HAPs = [(CT x cHAP) + (CM)] x (ton/2000 lbs)

where:

CT = the actual gallons of coating employed per year, not to exceed 6,156;

cHAP = the actual combined HAP content of the coatings, in pounds per gallon, not to exceed 3.5 lbs/gal; and

CM = the actual pounds of cleanup material employed, assumed to be 100% HAP, the yearly summation from d)(2).

f. Emission Limitation:

PE shall not exceed 9.9 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and the following equation:

Annual PE = (CT) x (S) x (1-65%) x (ton/2000 lbs)

where:

CT = the actual gallons of coating employed per year, not to exceed 6,156;

S = the actual solids content of the coatings, in pounds per gallon, not to exceed 9.19 lbs/gal; and

65% = the transfer efficiency of the electrostatic coating operation.

(2) The permittee shall use USEPA Method 24, environmental data sheet or Environmental Data Sheet to determine the VOC, xylene, toluene and HAP contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) The maximum uncontrolled annual particulate emissions from this emissions unit would be approximately 56.3 tons; therefore, the permittee elected a voluntary annual allowable PE limitation of less than 10 tons PE/yr to avoid BAT [see b)(2)f].