



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
DELAWARE COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08263

DATE: 6/19/2001

The Nippert Company
James Osteen
801 Pittsburgh Dr
Delaware, OH 43015

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 01-08263

Application Number: 01-08263
APS Premise Number: 0121010196
Permit Fee: **\$800**
Name of Facility: The Nippert Company
Person to Contact: James Osteen
Address: 801 Pittsburgh Dr
Delaware, OH 43015

Location of proposed air contaminant source(s) [emissions unit(s)]:
801 Pittsburgh Dr
Delaware, Ohio

Description of proposed emissions unit(s):
Conform lines 1 and 2.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

The Nippert Company
PTI Application: 01-08263
Issued: 6/19/2001

Facility ID: 0121010196

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	11.2

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - Conform Line #1- includes cleaning/rinse tanks, extrusion wheel, vaporizer, quench tank cooling system	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 4.44 lbs/hour. See Part II.A.2.a below.
	OAC rule 3745-31-05(D)	See Part II.A.2.b below.
	OAC rule 3745-21-07 (G)	See Part II.A.2.c below.

2. Additional Terms and Conditions

- 2.a The short term OC emission limitations were based on the emission unit's potential to emit,, therefore, recordkeeping and reporting requirements are not necessary.
- 2.b Organic compound emissions from P013 and P014 combined shall not exceed 11.2 TPY based on a cumulative rolling, 12-month summation.
- 2.c To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this

emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2. The maximum annual cover gas solution usage for emissions units P013 and P014 combined shall not exceed 3600 gallons per year, based on a rolling, 12-month summation of the monthly solution usage figures.

To ensure enforce ability during the first twelve months of operation following the issuance of this permit, the permittee shall not exceed the cumulative solution usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Solution Usage</u>
1-1	300
1-2	600
1-3	900
1-4	1200
1-5	1500
1-6	1800
1-7	2100
1-8	2400
1-9	2700
1-10	3000
1-11	3300
1-12	3600

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

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information:

- a. the emissions unit's hours of operation;
 - b. the solution usage for P013 and P014 combined; and
 - c. the rolling, 12-month summation of the solution usage for P013 and P014 combined.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
 3. The permit to install for this emissions unit (P013) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m³): 1884.3

Maximum Hourly Emission Rate (lbs/hr): 4.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 643.9

MAGLC (mg/m³): 44.86

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- 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

Emissions Unit ID: **P013**

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month solution usage limitation specified in B.1. These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A)(1).
- 2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

E. Testing Requirements

1. Emission Limitation -
Organic compound emissions shall not exceed 4.44 lbs/hour.

Applicable Compliance Method -

Compliance with this emission limitation is based on the emission unit's maximum hourly capacity of 45 cm³/min. According to the MSDS, the ethanol solution has a specific gravity of 0.807 and an OC content of 92.5%, 89.5% ethanol and 3% iso-butanol. Therefore:

$$(45 \text{ cm}^3/\text{min})(1 \text{ Liter}/1000 \text{ cm}^3)(1 \text{ gal}/3.785 \text{ Liter})(60 \text{ min/hr})(0.807 \text{ lb.sol/lb.water})(8.34 \text{ lbs.water/gal})(92.5\% \text{ OC content}) = 4.44 \text{ lbs.OC/hour}$$

2. Emission Limitation -
Organic compound emissions from P013 and P014 combined shall not exceed 11.2 TPY based on a cumulative rolling, 12-month summation.

Applicable Compliance Method -

Compliance with this emission limitation shall be determined by multiplying the rolling, 12-month summation of the solution usage for P013 and P014 combined, see Part II.C.1.c., by the solution's specific gravity of 0.807 (per MSDS) and OC content of 92.5%, 89.5% ethanol and 3% iso-butanol (per MSDS), as follows:

$$(\text{rolling, 12-month summation})(0.807 \text{ lb.sol/lb.water})(8.34 \text{ lbs.water/gal})(92.5\% \text{ OC content})(1 \text{ ton}/2000 \text{ lbs}) = \text{TPY OC emissions.}$$

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - Conform Line #2- includes cleaning/rinse tanks, extrusion wheel, vaporizer, quench tank cooling system	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 4.44 lbs/hour. See Part II.A.2.a below.
	OAC rule 3745-31-05(D)	See Part II.A.2.b below.
	OAC rule 3745-21-07 (G)	See Part II.A.2.c below.

2. Additional Terms and Conditions

- 2.a The short term OC emission limitations were based on the emission unit's potential to emit,, therefore, recordkeeping and reporting requirements are not necessary.
- 2.b Organic compound emissions from P013 and P014 combined shall not exceed 11.2 TPY based on a cumulative rolling, 12-month summation.
- 2.c To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2. The maximum annual cover gas solution usage for emissions units P013 and P014 combined shall not exceed 3600 gallons per year, based on a rolling, 12-month summation of the monthly solution usage figures.

To ensure enforce ability during the first twelve months of operation following the issuance of this permit, the permittee shall not exceed the cumulative solution usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Solution Usage</u>
1-1	300
1-2	600
1-3	900
1-4	1200
1-5	1500
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1-7	2100
1-8	2400
1-9	2700
1-10	3000
1-11	3300
1-12	3600

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the emissions unit's hours of operation;
 - b. the solution usage for P013 and P014 combined; and
 - c. the rolling, 12-month summation of the solution usage for P013 and P014 combined.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
3. The permit to install for this emissions unit (P014) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m³): 1884.3

Maximum Hourly Emission Rate (lbs/hr): 4.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 643.9

MAGLC (mg/m³): 44.86

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month solution usage limitation specified in B.1. These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

E. Testing Requirements

1. Emission Limitation -
Organic compound emissions shall not exceed 4.44 lbs/hour.

Applicable Compliance Method -

Compliance with this emission limitation is based on the emission unit's maximum hourly capacity of 45 cm³/min. According to the MSDS, the ethanol solution has a specific gravity of 0.807 and an OC content of 92.5%, 89.5% ethanol and 3% iso-butanol. Therefore:

$$(45 \text{ cm}^3/\text{min})(1 \text{ Liter}/1000 \text{ cm}^3)(1 \text{ gal}/3.785 \text{ Liter})(60 \text{ min}/\text{hr})(0.807 \text{ lb. sol}/\text{lb. water})(8.34 \text{ lbs. water}/\text{gal})(92.5\% \text{ OC content}) = 4.44 \text{ lbs. OC}/\text{hour}$$

2. Emission Limitation -

The Nippert Company
PTI Application: 01-08263
Issued

Facility ID: 0121010196

Emissions Unit ID: **P014**

Organic compound emissions from P013 and P014 combined shall not exceed 11.2 TPY based on a cumulative rolling, 12-month summation.

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PTI A
Issued: 6/19/2001

Emissions Unit ID: **P014**

Applicable Compliance Method -

Compliance with this emission limitation shall be determined by multiplying the rolling, 12-month summation of the solution usage for P013 and P014 combined, see Part II.C.1.c., by the solution's specific gravity of 0.807 (per MSDS) and OC content of 92.5%, 89.5% ethanol and 3% iso-butanol (per MSDS), as follows:

$(\text{rolling, 12-month summation})(0.807\text{lb.sol/lb.water})(8.34\text{lbs.water/gal})(92.5\%\text{OC content})(1\text{ ton}/2000\text{lbs}) = \text{TPY OC emissions.}$

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08263 Facility ID: 0121010196

FACILITY NAME The Nippert Company

FACILITY DESCRIPTION Conform lines 1 and 2. CITY/TWP Delaware

Emissions Unit ID: P014

SIC CODE 3351 SCC CODE 3-04-001-50 EMISSIONS UNIT ID P013

EMISSIONS UNIT DESCRIPTION Conform Line #1- includes cleaning/rinse tanks, extrusion wheel, vaporizer, quench tank cooling system

DATE INSTALLED 2/95

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				4.44	11.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination maximum annual cover gas solution usage for emissions units P013 and P014 shall not exceed 3600 gallons per year, based on a rolling, 12-month summation of the monthly solution usage

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: ethanol and iso-butanol

NEW SOURCE REVIEW FORM B

PTI Number: 01-08263 Facility ID: 0121010196

FACILITY NAME The Nippert Company

FACILITY DESCRIPTION Conform lines 1 and 2. CITY/TWP Delaware

Emissions Unit ID: **P014**

SIC CODE 3351 SCC CODE 3-04-001-50 EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION Conform Line #2- includes cleaning/rinse tanks, extrusion wheel, vaporizer, quench tank cooling system

DATE INSTALLED 6/99

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				4.44	11.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination maximum annual cover gas solution usage for emissions units P013 and P014 shall not exceed 3600 gallons per year, based on a rolling, 12-month summation of the monthly solution usage

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: ethanol and iso-butanol

2 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P014** _____

FACILITY DESCRIPTION Conform lines 1 and 2.

CITY/TWP Delaware

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

A. **General Information:** Nippert submitted a PTI application to install 2 new Conform Lines 1 and 2 which include cleaning/rinse tanks, extrusion wheel, vaporizer, quench tank cooling system and are used for the extrusion of high purity, oxygen free copper rods and wire.

B. **Applicable Rules:**
OAC rule 3745-31-05, OAC rule 3745-35-07(C)(1) and OAC rule 3745-21-07 (G)(2)

C. **Calculations:**
Max. ethanol solution flow rate = 45cc/min = 0.71 gallons/hour, per 9/18/00 application
Solution specific gravity = 0.807, per MSDS
Solution's OC content = 92.5% (89.5% ethanol, 3% iso-butanol), per MSDS

$$PTE = (0.71 \text{ gallons/hour})(0.807 \text{ #sol/#water})(8.34 \text{ #water/gal})(92.5\%OC \text{ content}) = 4.44 \text{ #OC/hour}$$
$$4.44 \text{ #OC/hour}(8760/2000) = 19.45 \text{ TPY per line for a total of } 38.9 \text{ TPY}$$

Allowable emissions:

$$(0.71 \text{ gallons/hour})(0.807 \text{ #sol/#water})(8.34 \text{ #water/gal}) (92.5\%OC \text{ content}) = 4.44 \text{ #OC/hour/line}$$
$$(3600 \text{ gal./yr})(0.807\text{\#sol/\#water})(8.34\text{\#water/gal})(92.5\%OC \text{ content})(1 \text{ ton}/2000\text{lbs})= 11.2 \text{ TPY OC}$$

total for both lines, **P013 and P014.**

NEW SOURCE REVIEW FORM B

PTI Number: 01-08263

Facility ID: 0121010196

FACILITY NAME The Nippert Company

FACILITY DESCRIPTION Conform lines 1 and 2.

CITY/TWP Delaware

Emissions Unit ID: P014

Compliance strategy is to record hours of operation. Assuming maximum usage rate of 0.71 gallons per hour, gallons used can be calculated along with OC emissions, assuming 100% of the 92.5% OC content is emitted.

D. Fee Explanation:

PWR is $(0.71 \text{ gallons per hour})(0.807 \text{ #sol/#water})(8.34 \text{ #water/gal}) = 4.77 \text{ #/hour} < 1000 \text{ #}$ so fee is \$200 per line. Both are installed so total fee is \$800.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install 01-08263

A. Source Description

Nippert is a facility that rolls, cleans, and dries copper. It is a growing facility and wishes to continue to grow. Therefore, to maximize their growth potential they wish to obtain synthetic minor permits for as long as possible. Conform Lines 1 and 2 include cleaning/rinse tanks, extrusion wheel, vaporizer, quench tank cooling system and are used for the extrusion of high purity, oxygen free copper rods and wire.

B. Facility Emissions and Attainment Status

Nippert is a non Title V facility located in Delaware County, attainment for all pollutants. Facility wide emissions are mostly organic compounds. They currently have a facility wide potential of approximately 50 TPY of OC emissions. This PTI, unrestricted, would put their facility wide potential to emit up to approximately 90 TPY OC. With the requested solution usage limitation their facility wide potential to emit will end up being approximately 60 TPY of OC, giving them flexibility for desired future expansion.

C. Source Emissions

Nippert requests an annual ethanol solution usage restriction of 3,600 gallons for both conform lines P013 and P014, combined. According to the MSDS, the ethanol solution has a specific gravity of 0.807 and an OC content of 92.5% (89.5% ethanol and 3% iso-butanol). The maximum hourly usage is 45 cm³/min/line. Therefore, potential to emit would be:

$$(45 \text{ cm}^3/\text{min}/\text{line})(1 \text{ Liter}/1000 \text{ cm}^3)(1 \text{ gal}/3.785 \text{ Liter})(60 \text{ min}/\text{hr})(0.807 \text{ #sol/#water})(8.34 \text{ #water/gal})(92.5\% \text{ OC content}) = 4.44 \text{ #OC}/\text{hour}(8760/2000) = 19.45 \text{ TPY per line for a total of } 38.9 \text{ TPY.}$$

With the 3600 gallon restriction, annual emissions would then be:

$$(3600 \text{ gal./yr})(0.807 \text{ #sol/#water})(8.34 \text{ #water/gal})(92.5\% \text{ OC content})(1 \text{ ton}/2000 \text{ lbs}) = 11.2 \text{ TPY OC total for both lines.}$$

The compliance strategy is to record hours of operation. Assuming maximum usage rate of 45 cm³/min/line or 0.71 gallons per hour, gallons used can be calculated along with OC emissions, assuming

NEW SOURCE REVIEW FORM B

PTI Number: 01-08263

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FACILITY NAME The Nippert Company

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CITY/TWP Delaware

Emissions Unit ID: **P014**

100% of the 92.5% OC content is emitted.

D. Conclusion

As a result of the limited annual ethanol solution usage restriction of 3,600 gallons for both conform lines P013 and P014, Nippert's facility wide potential to emit would remain well below the Title V threshold at approximately 60 TPY rather than be approximately 90 TPY. Therefore Nippert has more flexibility for future expansion.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

VOC

11.2