



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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

5/12/2009

Michael Burriss
Clymer Enterprises, Inc.
407 E. Washington Street
Pandora, OH 45877

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0369000045
Permit Number: P0104871
Permit Type: Renewal
County: Putnam

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Putnam County Sentinal. 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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, Northwest District Office at (419)352-8461.

Sincerely,

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

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

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Clymer Enterprises, Inc.

Issue Date: 5/12/2009

Permit Number: P0104871

Permit Type: Renewal

Permit Description: PTIO Renewal for two paint booths.

Facility ID: 0369000045

Facility Location: Clymer Enterprises, Inc.
407 E. Washington St.,
Pandora, OH 45877

Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to
Manufacturers

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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. 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
Clymer Enterprises, Inc.**

Facility ID: 0369000045
Permit Number: P0104871
Permit Type: Renewal
Issued: 5/12/2009
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
Clymer Enterprises, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0369000045
Application Number(s): A0037500
Permit Number: P0104871
Permit Description: PTIO Renewal for two paint booths.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 5/12/2009
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:

Clymer Enterprises, Inc.
407 E. Washington St.
Pandora, OH 45877

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104871

Permit Description: PTIO Renewal for two paint booths.

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:	Conveyorized Paint Line
Superseded Permit Number:	03-16176
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Drive-in Paint Booth
Superseded Permit Number:	03-16176
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, Conveyorized Paint Line

Operations, Property and/or Equipment Description:

Paint Line Spray Booths

- 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. d)(3)-d)(5).
 - (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)(1)c., b)(2)c., b)(2)e., c)(1), d)(1), and e)(1).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	80.01 pounds of volatile organic compounds (VOC) per hour, from coating operations 1225.8 pounds VOC per month, 7.35 tons VOC per year, from cleanup operations 4.49 pounds particulate emissions (PE) per hour, 2.95 tons PE per year Visible particulate emissions shall not exceed 0% opacity, as a six-minute average. See b)(2)a. and b)(2)d.
b.	OAC rule 3745-31-05(D)	52.50 tons VOC per rolling, 12-month period from coating operations [See b)(2)c., b)(2)e., and c)(1)]
c.	OAC rule 3745-21-09(l)	3.00 pounds of VOC per gallon of coating, excluding water and exempt solvents



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	See b)(2)b.
e.	OAC rule 3745-17-07(A)	See b)(2)b.
f.	OAC rule 3745-17-11(C)	See b)(2)f. and c)(2).

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(I).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The emissions of VOC from this emissions unit shall not exceed 52.50 tons per rolling, 12-month period from coating operations. The VOC emission limitation is based on material usage and content restrictions [See c)(1) and b)(2)e.]. Federally enforceable VOC limitations are being established for purposes of avoiding Title V and PSD applicability.
- d. Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of dry filtration for control of particulate emissions.
- e. The maximum VOC content for coatings employed in this emissions unit is restricted to 3.0 lbs/gallon as established by OAC rule 3745-21-09 (I).
- f. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

[On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11 shall be 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.]

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 35,000 gallons based upon a rolling, 12-month summation of the monthly coating usage rates.

Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- (2) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:

- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.



- b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for the coatings usage in this emissions unit:
 - a. the company name and identification for each coating employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - c. the VOC content of each coating, as applied, in lbs/gallon;
 - d. the number of gallons of each coating employed;
 - e. the total number of gallons of all the coatings employed [summation of d)(1)d. for all coatings];



- f. the VOC emission rate for each coating employed [d)(1)c. x d)(1)d.], in pounds;
 - g. the total VOC emission rate for all coatings employed (summation of d)(1)f. for all coatings), in pounds;
 - h. the rolling, 12-month VOC emission rate, in tons;
 - i. the rolling, 12-month coating usage rate, in gallons.
- (2) The permittee shall collect and record the following information each month for the cleanup operations in this emissions unit:
- a. the company name and identification for each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC emission rate for each cleanup material employed [d)(2)b. x d)(2)c.], in pounds;
 - e. the total VOC emission rate for all cleanup materials employed (summation of d)(2)d. for all cleanup materials), in pounds;
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(2)e. for each calendar month to date from January to December).
- (3) The Permit to Install for this emissions units 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 Screen3 model. The predicted 1-hour maximum ground-level concentration from the use of the Screen3 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: methyl n-amyl ketone
 TLV (ug/m³): 233,497
 Maximum Hourly Emission Rate (lbs/hr): 35.74
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3360.4
 MAGLC (ug/m³): 5559.5

Pollutant: isobutyl alcohol
 TLV (ug/m³): 151,575
 Maximum Hourly Emission Rate (lbs/hr): 10.0537
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 945.4
 MAGLC (ug/m³): 3608.9



Pollutant: n-butyl alcohol
TLV ($\mu\text{g}/\text{m}^3$): 60,630
Maximum Hourly Emission Rate (lbs/hr): 4.5642
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 429.2
MAGLC ($\mu\text{g}/\text{m}^3$): 1443.6

(4) 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(5) 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.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month VOC emission limitation of 52.50 tons;
 - ii. all exceedances of the monthly VOC emission limitation of 1,225.8 pounds from the cleanup operations.
 - iii. all exceedances of the rolling, 12-month coatings usage restriction of 35,000 gallons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.00 lbs of VOC/gallon excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.
- (3) 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 section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:



- a. Emission Limitation:
80.01 pounds VOC per hour for coating operations

Applicable Compliance Method:
The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (26.67 gallons per hour) by the maximum VOC content of all the coatings (3.00 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
- b. Emission Limitation:
52.50 tons VOC per rolling, 12-month period, from coating operations

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(1) of this permit.
- c. Emission Limitation:
The maximum annual coatings usage rate shall not exceed 35,000 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method:
Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(1) of this permit.
- d. Emission Limitation:
1225.8 lbs VOC per month, 7.35 tons VOC per year from cleanup operations

Applicable Compliance Method:
Compliance with the monthly allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.
- e. Emission Limitation:
3.00 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.
- f. Emission Limitation:
4.49 pounds PE per hour; 2.95 tons PE per year



Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

maximum coating solids usage rate = (highest density of coating)X(highest solids content in %)X(26.67 gallons per hour)

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used where in this case it is 75%.

CE = Control efficiency of the control equipment (paint booth filters) considered at 90%.

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the annual material usage limitation with the highest solids pound per gallon of coating, and then dividing by 2000. Therefore, if compliance is shown with the hourly material usage limitation, compliance is shown with the annual limitation.

g. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



2. K002, Drive-in Paint Booth

Operations, Property and/or Equipment Description:

Drive-in Paint Booth

- 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. d)(3)-d)(5).
 - (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)(1)b., b)(2)d., b)(2)f., c)(1), d)(1), and e)(1).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	7.00 pounds of volatile organic compounds (VOC) per hour 58.8 pounds VOC per month; 0.35 tons VOC per year from cleanup operations 0.14 pound particulate emissions (PE) per hour, 0.17 tons PE per year Visible particulate emissions shall not exceed 0% opacity, as a six-minute average See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	8.82 tons VOC per rolling, 12-month period from coating operations [See b)(2)d., b)(2)f., and c)(1)]
c.	OAC rule 3745-17-11(B)	See b)(2)b.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-21-09(U)(1)(d)	<u>Miscellaneous Metal Parts</u> 3.50 pounds of VOC per gallon of



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		coating, excluding water and exempt solvents [See b)(2)g.]
f.	OAC rule 3745-21-09(I)	<u>Metal Furniture Coating Operation</u> 3.00 pounds of VOC per gallon of coating, excluding water and exempt solvents [See b)(2)g.]
g.	OAC rule 3745-17-11(C)	See b)(2)h. and c)(2).

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rule 3745-21-09(I), and OAC rule 3745-21-09(U)(1)(d).
 - b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Putnam county.
 - c. This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - d. The emissions of VOC from this emissions unit shall not exceed 8.82 tons per rolling 12-month period from coating operations. The VOC emission limitation is based on material usage and content restrictions [See c)(1) and d)(2)f.]. Federally enforceable VOC limitations are being established for purposes of avoiding Title V and PSD applicability.
 - e. Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of dry filtration for control of particulate emissions.
 - f. The maximum VOC content for coatings employed in this emissions unit is restricted to 3.5 lbs/gallon as established by OAC rule 3745-21-09(U)(1)(d).
 - g. This emissions unit applies coatings to miscellaneous metal parts and to metal furniture. When coating miscellaneous metal parts, the emissions unit is subject to OAC rule 3745-21-09(U)(1)(d) requiring the use of a compliant coating that does not exceed 3.50 pounds VOC per gallon excluding water and exempt solvents. When coating metal furniture, the emissions unit is subject to OAC rule 3745-21-09(I) requiring the use of a compliant coating that does not exceed 3.00 pounds VOC per gallon excluding water and exempt solvents. Miscellaneous metal parts and metal furniture are defined in OAC rule 3745-21-01.
 - h. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- c) [On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph



(C) of OAC rule 3745-17-11 shall be 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.]Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 5,040 gallons based upon a rolling, 12-month summation of the monthly coating usage rates.

Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

(2) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:

- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coatings usage in this emission unit:
 - a. the company name and identification for each coating employed;
 - b. identification of the material that the coating in d)(1)a. is being applied to (i.e. metal furniture or miscellaneous metal parts);
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the VOC content of each coating, as applied, in lbs/gallon;
 - e. the number of gallons of each coating employed;
 - f. the total number of gallons of all the coatings employed (summation of d)(1)e. for all coatings);
 - g. the VOC emission rate for each coating employed [d)(1)d. x d)(1)e.], in pounds;
 - h. the total VOC emission rate for all coatings employed (summation of d)(1)g. for all coatings), in pounds;
 - i. the rolling, 12-month VOC emission rate, in tons;
 - j. the rolling, 12-month coating usage rate, in gallons.
- (2) The permittee shall collect and record the following information each month for the cleanup operations in this emission unit:
 - a. the company name and identification for each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC emission rate for each cleanup material employed [d)(2)b. x d)(2)c.], in pounds;
 - e. the total VOC emission rate for all cleanup materials employed (summation of d)(2)d. for all cleanup materials), in pounds;
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(2)e. for each calendar month to date from January to December).
- (3) The Permit to Install for this emissions units was evaluated based on the actual materials (typically coating 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 Screen3 model. The predicted 1-hour maximum ground-level concentration from the use of the Screen3 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: Ethylene glycol mono butyl ether (2-Butoxyethanol [EGBE])

TLV (ug/m³): 96,663

Maximum Hourly Emission Rate (lbs/hr): 1.693

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2093

MAGLC (ug/m³): 2301.5

- (4) 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (5) 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.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month VOC emission limitation of 8.82 tons;
 - ii. all exceedances of the monthly VOC emission limitation of 58.80 pounds from the cleanup operations; and
 - iii. all exceedances of the rolling, 12-month coatings usage restriction of 5,040 gallons.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings for the following:

- a. coatings that exceed the 3.00 lbs of VOC/gallon excluding water and exempt solvents when coating metal furniture.
- b. coatings that exceed the 3.50 lbs of VOC/gallon excluding water and exempt solvents when coating miscellaneous metal parts.

The notifications shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.



These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (3) 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 section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
7.00 pounds VOC per hour for coating operations

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2 gallons per hour) by the maximum VOC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation:
8.82 tons VOC per rolling, 12-month period, from coating operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(1) of this permit.

- c. Emission Limitation:
The maximum annual coatings usage rate shall not exceed 5,040 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method:

Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

- d. Emission Limitation:
58.8 lbs VOC per month, 0.35 tons VOC per year from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.



- e. Emission Limitation:
3.00 pounds VOC per gallon of coating, excluding water and exempt solvents when coating metal furniture

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

- f. Emission Limitation:
3.50 pounds VOC per gallon of coating, excluding water and exempt solvents when coating miscellaneous metal parts

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

- g. Emission Limitation:
0.14 pounds PE per hour; 0.17 tons PE per year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

maximum coating solids usage rate = (highest density of coating)X(highest solids content in %)X(2 gallons per hour)

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used where in this case it is 75%.

CE = Control efficiency of the control equipment (paint booth filters) considered at 90%.

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the annual material usage limitation with the highest solids pound per gallon of coating, and then dividing by 2000. Therefore, if compliance is shown with the hourly material usage limitation, compliance is shown with the annual limitation.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104871

Facility ID: 0369000045

Effective Date: To be entered upon final issuance

- h. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.