



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

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

6/17/2009

MIKE AUSTIN  
AMERICAN AUGERS INC  
135 US RTE 42  
WEST SALEM, OH 44287

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0303000167  
Permit Number: P0104809  
Permit Type: Initial Installation  
County: Ashland

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:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: Ohio EPA-NWDO

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





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
AMERICAN AUGERS INC**

Facility ID: 0303000167  
Permit Number: P0104809  
Permit Type: Initial Installation  
Issued: 6/17/2009  
Effective: 6/17/2009  
Expiration: 6/17/2019





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
**AMERICAN AUGERS INC**

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

    2. Who is responsible for complying with this permit? ..... 4

    3. What records must I keep under this permit? ..... 4

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

    5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4

    6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5

    7. What reports must I submit under this permit? ..... 5

    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? ..... 5

    9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5

    10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6

    11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6

    12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6

    13. Can I transfer this permit to a new owner or operator? ..... 6

    14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7

    15. What happens if a portion of this permit is determined to be invalid? ..... 7

B. Facility-Wide Terms and Conditions ..... 8

C. Emissions Unit Terms and Conditions ..... 10

    1. K003, Large, 90' spray booth with two curing ovens..... 11

    2. K004, Small, 65' spray booth with a curing oven ..... 16

    3. P801, Facility wide cleanup operations ..... 21





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104809  
**Facility ID:** 0303000167  
**Effective Date:** 6/17/2009

## Authorization

Facility ID: 0303000167  
Application Number(s): A0037408, A0037760  
Permit Number: P0104809  
Permit Description: The purpose of this permit is to address the installation of two miscellaneous metal parts coating operations and to establish facility-wide cleanup operations.  
Permit Type: Initial Installation  
Permit Fee: \$600.00  
Issue Date: 6/17/2009  
Effective Date: 6/17/2009  
Expiration Date: 6/17/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15  
This document constitutes issuance to:

AMERICAN AUGERS INC  
135 US RTE 42  
West Salem, OH 44287

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



## Authorization (continued)

Permit Number: P0104809  
Permit Description: The purpose of this permit is to address the installation of two miscellaneous metal parts coating operations and to establish facility-wide cleanup operations.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

- |                                   |  |
|-----------------------------------|--|
| <b>Emissions Unit ID:</b>         | <b>K003</b>                                  |
| Company Equipment ID:             | Large, 90' spray booth with two curing ovens |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                               |
| <b>Emissions Unit ID:</b>         | <b>K004</b>                                  |
| Company Equipment ID:             | Small, 65' spray booth with a curing oven    |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                               |
| <b>Emissions Unit ID:</b>         | <b>P801</b>                                  |
| Company Equipment ID:             | Facility wide cleanup operations             |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                               |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104809

**Facility ID:** 0303000167

**Effective Date:** 6/17/2009

## **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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104809

**Facility ID:** 0303000167

**Effective Date:** 6/17/2009

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104809

**Facility ID:** 0303000167

**Effective Date:** 6/17/2009

## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104809

**Facility ID:** 0303000167

**Effective Date:** 6/17/2009

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

**Final Permit-to-Install and Operate**

**Permit Number:** P0104809

**Facility ID:** 0303000167

**Effective Date:** 6/17/2009

## **C. Emissions Unit Terms and Conditions**



**1. K003, Large, 90' spray booth with two curing ovens**

**Operations, Property and/or Equipment Description:**

Miscellaneous metal parts spray booth with two, 3.9 mmBtu/hr natural gas fired curing ovens.

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

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

a. b)(1)e. and d)(7).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                | Applicable Emissions Limitations/Control Measures   |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3)(a)                 | 8.73 lbs volatile organic compounds (VOC)/yr & 38.24 tons VOC/yr<br><br>See b)(2)a.   |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii)             | See b)(2)c.   |
| c. | OAC rule 3745-17-11(C)                       | See b)(2)e., c)(1) and c)(2).   |
| d. | OAC rule 3745-21-09(U)(1)(i)                 | 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, that are not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of this rule |
| e. | ORC 3704.03(F)(4)(b)<br>OAC rule 3745-114-01 | See d)(7)   |

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i).

b. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this



emissions unit [PE is emitted in the form of filterable particulate matter 10 microns or less in size (PM<sub>10</sub>)]. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- c. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to PM<sub>10</sub>, carbon monoxide (CO), and nitrogen oxide (NO<sub>x</sub>) from this emissions unit since the calculated annual emissions for PM<sub>10</sub>, CO, and NO<sub>x</sub> are each less than ten tons per year.

CO and NO<sub>x</sub> are emitted as products of combustion from natural gas curing ovens serving the emissions unit. Other products of combustion (i.e. sulfur dioxide, etc.) were negligible and were not considered in this permitting action.

- d. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- e. The permittee shall install and operate a dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the name and identification number of 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 employed, in lbs/gallon, as applied;
  - d. the number of gallons of each coating employed;
  - e. the VOC emission rate for each coating [d)(7)c. x d)(7)d.], in lbs/month;
  - f. the total monthly VOC emission rate for all coatings employed, in tons [summation of d)(7)e. for all coatings]; and,
  - g. the annual, year-to-date VOC emission rate for all coatings employed, [summation of d)(7)f. for each calendar month to date from January to December], in tons.

- (7) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and



obtain a new or modified permit to install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.0 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (2) 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 limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

8.73 lbs volatile organic compounds (VOC)/hr

Applicable Compliance Method

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping and deviation reporting are required to ensure compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1-4 and 18, 25, or 25A, as applicable, of 40 CFR Part 60, Appendix A.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 4.50 gallons per hour and a maximum VOC content of 1.94 pounds per gallon.

b. Emission Limitation

38.24 tons VOC/yr

Applicable Compliance Method

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(6).



c. Emission Limitation

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, that are not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of this rule

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section d)(6). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

g) Miscellaneous Requirements

(1) None.



**2. K004, Small, 65' spray booth with a curing oven**

**Operations, Property and/or Equipment Description:**

Miscellaneous metal parts spray booth with a 5.2 mmBtu/hr natural gas fired curing oven.

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

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

a. b)(1)e. and d)(7).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                | Applicable Emissions Limitations/Control Measures   |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3)(a)                 | 3.88 lbs volatile organic compounds (VOC)/yr & 16.99 tons VOC/yr<br><br>See b)(2)a.   |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii)             | See b)(2)c.   |
| c. | OAC rule 3745-17-11(C)                       | See b)(2)e., c)(1) and c)(2).   |
| d. | OAC rule 3745-21-09(U)(1)(i)                 | 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, that are not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of this rule |
| e. | ORC 3704.03(F)(4)(b)<br>OAC rule 3745-114-01 | See d)(7)   |

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C) and OAC rule 3745-21-09(U)(1)(i).

b. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this



emissions unit [PE is emitted in the form of filterable particulate matter 10 microns or less in size (PM<sub>10</sub>)]. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- c. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to PM<sub>10</sub>, carbon monoxide (CO), and nitrogen oxide (NO<sub>x</sub>) from this emissions unit since the calculated annual emissions for PM<sub>10</sub>, CO, and NO<sub>x</sub> are each less than ten tons per year.

CO and NO<sub>x</sub> are emitted as products of combustion from a natural gas curing oven serving the emissions unit. Other products of combustion (i.e. sulfur dioxide, etc.) were negligible and were not considered in this permitting action.

- d. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- e. The permittee shall install and operate a dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the name and identification number of 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 employed, in lbs/gallon, as applied;
  - d. the number of gallons of each coating employed;
  - e. the VOC emission rate for each coating [d)(7)c. x d)(7)d.], in lbs/month;
  - f. the total monthly VOC emission rate for all coatings employed, in tons [summation of d)(7)e. for all coatings]; and,
  - g. the annual, year-to-date VOC emission rate for all coatings employed, [summation of d)(7)f. for each calendar month to date from January to December], in tons.

- (7) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and



obtain a new or modified permit to install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.0 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (2) 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 limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

3.88 lbs volatile organic compounds (VOC)/hr

Applicable Compliance Method

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping and deviation reporting are required to ensure compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1-4 and 18, 25, or 25A, as applicable, of 40 CFR Part 60, Appendix A.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 2.00 gallons per hour and a maximum VOC content of 1.94 pounds per gallon.

b. Emission Limitation

16.99 tons VOC/yr

Applicable Compliance Method

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(6).



c. Emission Limitation

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, that are not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of this rule

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section d)(6). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

g) Miscellaneous Requirements

(1) None.



**3. P801, Facility wide cleanup operations**

**Operations, Property and/or Equipment Description:**

Facility wide cleanup operations.

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

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

a. b)(1)c. and d)(2).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3)(a)                 | None<br><br>See b)(2)a. and c)(1)                 |
| b. | OAC rule 3745-21-09                          | See b)(2)b.                                       |
| c. | ORC 3704.03(F)(4)(b)<br>OAC rule 3745-114-01 | See d)(2)   |

(2) Additional Terms and Conditions

a. The “Best Available Technology (BAT)” requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the organic compound (OC) emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. The organic compounds emitted from this emissions unit are not a precursor to an established NAAQS.

The organic compound emissions from this emission unit do not include any volatile organic compounds as specified in c)(1).



- b. The OC emission limitations for this emissions unit include cleanup emissions previously accounted for in emissions unit K001 (miscellaneous metal parts coating operation) as issued in PTI 03-10211 on 6/2/1997. Emissions from clean-up operations associated with emissions unit K001 are being separated and included in the emission limitation of emissions unit P801 to simplify recordkeeping requirements.
  
- c) Operational Restrictions
  - (1) The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
  
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month for clean-up material usage for the entire facility (emissions unit P801):
    - a. the company name and identification for each cleanup material employed; and
    - b. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01.
  - (2) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>6</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
  
- e) Reporting Requirements
  - (1) 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) None.
  
- g) Miscellaneous Requirements
  - (1) None.