



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
FRANKLIN COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 01-08925**

**Fac ID: 0125040425**

**DATE: 1/25/2005**

PSB Company, a Division of White Castle  
Jeffrey Miller  
555 West Goodale Street  
Columbus, OH 43215

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

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

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

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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CDO



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 1/25/2005  
Effective Date: 1/25/2005**

---

**FINAL PERMIT TO INSTALL 01-08925**

Application Number: 01-08925  
Facility ID: 0125040425  
Permit Fee: **\$200**  
Name of Facility: PSB Company, a Division of White Castle  
Person to Contact: Jeffrey Miller  
Address: 555 West Goodale Street  
Columbus, OH 43215

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**555 West Goodale Street  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**Batch powder paint system.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

6

**PSB Company, a Division of White Castle**  
**PTI Application: 01-08925**  
**Issued: 1/25/2005**

**Facility ID: 0125040425**

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	7.95
NOx	0.90
CO	0.76
SO2	0.01
VOC	0.05

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K001 - Batch powder paint system with natural gas oven	OAC rule 3745-31-05(A)(3)	OAC 3745-17-07(A)
		OAC rule 3745-17-11(B)

Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	
Particulate emissions (PE) from the coating's application, storage, and handling shall not exceed 1.80 pounds per hour and 7.88 tons per year.	gas usage in the curing oven shall not exceed 0.001 pound per hour and 0.01 ton per year.  Visible particulate emissions shall not exceed 20% opacity as a six minute average.
PE from the natural gas usage in the curing oven shall not exceed 0.02 pound per hour and 0.07 ton per year.	The emission limitation specified in this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
Nitrogen oxide (NOx) emissions from the natural gas usage in the curing oven shall not exceed 0.21 pound per hour and 0.90 ton per year.	
Carbon monoxide (CO) emissions from the natural gas usage in the curing oven shall not exceed 0.17 pound per hour and 0.76 ton per year.	
Volatile organic compound (VOC) emissions from the natural gas usage in the curing oven shall not exceed 0.01 pound per hour and 0.05 ton per year.	
Sulfur dioxide (SO2) emissions from the natural	

**2. Additional Terms and Conditions**

- 2.a** Emission limitations were established to reflect the hourly and annual potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b** This emissions unit may not employ coatings that produce volatile organic compound (VOC) emissions.

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, and until the paint booth is clear of overspray.
2. The permittee shall burn only natural gas in this emissions unit.
3. The permittee shall maintain all doors, windows and openings in the paint booth such that the air flow goes into the paint booth and prevents the release of fugitive emissions whenever this emissions unit and/or dry filtration system is in operation.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. For each day during which a coating is used that has VOC emissions.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted to the Ohio EPA, Central District Office within 30 days after the deviation occurs.
2. The permittee shall submit deviation reports which identify the days during which materials that produce OC emissions are used in this emissions unit. Each report shall identify the cause for the use of this material, and the estimated total quantity of materials emitted during each such day, in pounds. Each report shall be submitted to the Ohio EPA, Central District Office within 30 days

of the deviation.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the annual emission limitation for particulate emissions based on coating usage records required in Section C.3. These reports shall be submitted by January 31 of the following calendar year.
4. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.

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

1. Compliance with the emission limitation(s) specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

Particulate emissions (PE) from the coating's application, storage, and handling shall not exceed 1.80 pounds per hour and 7.88 tons per year.

Applicable Compliance Method:

Compliance with the hourly particulate emissions limit shall be determined by adding the filtered emissions and the fugitive emissions from the paint booth. The filtered emissions shall be determined by multiplying the maximum coating material usages per hour (22 lbs coating/hour) by the overspray ratio (1.1 lbs oversprayed coating/2.1 lbs coating) by 1 lb PE/lb oversprayed coating by the paint booth capture (85%) by the control efficiency of the filter (100% - 99.3%). The fugitive emissions from the paint booth shall be determined by multiplying the maximum coating material usages per hour (22 lbs coating/hour) by the overspray ratio (1.1 lbs oversprayed coating/2.1 lbs coating) by 1 lb PE/lb oversprayed coating by the paint booth capture efficiency (100% - 85%). The maximum coating usage, overspray ratio, paint booth capture and filter control efficiencies are stated in the Permit-to-Install application submitted on November 16, 2004.

Compliance with the annual particulate emissions limit shall be determined by multiplying the maximum hourly emissions (in lbs/hr) by 8760 hours per year and dividing by 2000 lbs/ton.

- b. Emissions Limitation:

particulates emissions (PE) from the natural gas usage in the curing oven shall not exceed 0.02 pound per hour and 0.07 ton per year.

12

**PSB Company, a Division of White Castle**

**PTI Application: 01 08075**

**Issued**

**Facility ID: 0125040425**

**Emissions Unit ID: K001**

Applicable Compliance Method:

Compliance with the hourly particulate emissions limit shall be determined by multiplying the maximum hourly heat rate (2.1 mmBtu/hr, application, November 16, 2004) by 1 mmscf/1020 mmBtu by the AP-42 emissions factor (7.6 lbs PE/mmscf, AP-42, 1.4, July 1998).

Compliance with the annual particulate emissions limit shall be determined by multiplying the maximum hourly emissions (in lbs/hr) by 8760 hours per year and dividing by 2000 lbs/ton.

c. Emissions Limitation:

Nitrogen oxide (NO<sub>x</sub>) emissions from the natural gas usage in the curing oven shall not exceed 0.21 pound per hour and 0.90 ton per year.

Applicable Compliance Method:

Compliance with the hourly NO<sub>x</sub> limit shall be determined by multiplying the maximum hourly heat rate (2.1 mmBtu/hr, application, November 16, 2004) by 1 mmscf/1020 mmBtu by the AP-42 emissions factor (100 lbs NO<sub>x</sub>/mmscf, AP-42, 1.4, July 1998).

Compliance with the annual NO<sub>x</sub> limit shall be determined by multiplying the maximum hourly emissions (in lbs/hr) by 8760 hours per year and dividing by 2000 lbs/ton.

d. Emissions Limitation:

Carbon monoxide (CO) emissions from the natural gas usage in the curing oven shall not exceed 0.17 pound per hour and 0.76 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO limit shall be determined by multiplying the maximum hourly heat rate (2.1 mmBtu/hr, application, November 16, 2004) by 1 mmscf/1020 mmBtu by the AP-42 emissions factor (84 lbs CO/mmscf, AP-42, 1.4, July 1998).

Compliance with the annual CO limit shall be determined by multiplying the maximum hourly emissions (in lbs/hr) by 8760 hours per year and dividing by 2000 lbs/ton.

e. Emissions Limitation:

Volatile organic compound (VOC) emissions from the natural gas usage in the curing oven shall not exceed 0.01 pound per hour and 0.05 ton per year.

Applicable Compliance Method:

Emissions Unit ID: **K001**

Compliance with the hourly VOC limit shall be determined by multiplying the maximum hourly heat rate (2.1 mmBtu/hr, application, November 16, 2004) by 1 mmscf/1020 mmBtu by the AP-42 emissions factor (5.5 lbs VOC/mmscf, AP-42, 1.4, July 1998).

Compliance with the annual VOC limit shall be determined by multiplying the maximum hourly emissions (in lbs/hr) by 8760 hours per year and dividing by 2000 lbs/ton.

f. Emissions Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions from the natural gas usage in the curing oven shall not exceed 0.001 pound per hour and 0.01 ton per year.

Applicable Compliance Method:

Compliance with the hourly SO<sub>2</sub> limit shall be determined by multiplying the maximum hourly heat rate (2.1 mmBtu/hr, application, November 16, 2004) by 1 mmscf/1020 mmBtu by the AP-42 emissions factor (0.6 lbs SO<sub>2</sub>/mmscf, AP-42, 1.4, July 1998).

Compliance with the annual SO<sub>2</sub> limit shall be determined by multiplying the maximum hourly emissions (in lbs/hr) by 8760 hours per year and dividing by 2000 lbs/ton.

g. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Method 9.

## F. Miscellaneous Requirements

None