

Synthetic Minor Determination and/or Netting Determination

Permit To Install **01-08927**

A. SOURCE DESCRIPTION

Worthington Cylinder Corp. is requesting a Chapter 31 modification for two paint lines and a three-station silk screening operation (K001, K002 and K003). The permittee will begin using a cleanup material that contains only acetone (OC) and no VOC. HAP emissions limitations for coatings were established in the facilities FESOP issued on 03/15/2004. This modification does not increase HAP emissions.

B. FACILITY EMISSIONS AND ATTAINMENT STATUS

The emissions unit contained in this PTI have the following emissions:

Emissions Unit	Pollutant	Pre-Synthetic Minor (tons per year)	Synthetic Minor/Permitted Limits (tons per year)
K001	VOC	153.30	47.84
	OC	n/a	8.24
K002	VOC	153.30	47.84
	OC	n/a	8.24
K003	VOC	22.78	2.48
	OC	n/a	6.59

The permitted emissions units at the facility that are not contained in this PTI have the following emissions limitations:

Emissions Unit	Permit	Pollutant	Annual Limit (tons per year)
P005	PTI 01-6462	VOC	1.7
P005	PTI 01-6462	NOx	6.2
P005	PTI 01-6462	PE	0.8
P005	PTI 01-6462	CO	1.3
P005	PTI 01-6462	SO2	0.1
Facility wide	FESOP	single HAP	9.9
Facility wide	FESOP	combined HAPs	24.9

C. SOURCE EMISSIONS

Worthington Cylinder Corp. would be a major source of VOC without the restrictions contained in this PTI. With the addition of the OC emissions from this permit, facility wide annual emissions limits will be 6.2 tons NOx/yr, 1.3 tons CO/yr, 99.86 tons VOC/year, 0.8 ton PE/year, 0.1 ton SO2/year, 23.07 tons OC/yr, 9.9 tons single HAP/yr and 24.9 tons combined HAPs/yr.

D. CONCLUSION

The terms and conditions of this PTI effectively restricts the VOC emissions below the Title V thresholds. The operational restrictions, record keeping, reporting and testing requirements will ensure that compliance with this permit is achieved and maintained.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 01-08927
Fac ID: 0125041404

DATE: 2/15/2005

Worthington Cylinder Corp
David Leff
1085 Dearborn Dr
Columbus, OH 43085

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

FRANKLIN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08927 FOR AN AIR CONTAMINANT SOURCE FOR
Worthington Cylinder Corp**

On 2/15/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Worthington Cylinder Corp**, located at **1085 Dearborn Dr, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08927:

Silk screen operation.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-08927

Application Number: 01-08927
Facility ID: 0125041404
Permit Fee: **To be entered upon final issuance**
Name of Facility: Worthington Cylinder Corp
Person to Contact: David Leff
Address: 1085 Dearborn Dr
Columbus, OH 43085

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1085 Dearborn Dr
Columbus, Ohio**

Description of proposed emissions unit(s):

Silk screen operation.

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

Worthington Cylinder Corp

Facility ID: 0125041404

PTI Application: 01-08927

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

Worthington Cylinder Corp

PTI Application: 01-08927

Issued: To be entered upon final issuance

Facility ID: 0125041404

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

Worthington Cylinder Corp

Facility ID: 0125041404

PTI Application: 01-08927

Issued: To be entered upon final issuance

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

Worthington Cylinder Corp

Facility ID: 0125041404

PTI Application: 01-08927

Issued: To be entered upon final issuance

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Worthington Cylinder Corp

PTI Application: 01-08927

Issued: To be entered upon final issuance

Facility ID: 0125041404

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

Worthington Cylinder Corp

Facility ID: 0125041404

PTI Application: 01-08927

Issued: To be entered upon final issuance

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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

Worthington Cylinder Corp

Facility ID: 0125041404

PTI Application: 01-08927

Issued: To be entered upon final issuance

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.

5. 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.

6. 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.

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

Worthington Cylinder Corp

Facility ID: 0125041404

PTI Application: 01-08927

Issued: To be entered upon final issuance

if applicable) 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.

Worth
PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	98.16
OC	23.07

14

Worthington Cylinder Corp

PTI Application: 01-08927

Issued: To be entered upon final issuance

Facility ID: 0125041404

15

Worth

PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Worth

PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Total combined HAPs emissions from emissions units K001, K002 and K003 combined shall not exceed 24.9 tons per year based on a rolling 12-month summation of monthly emissions.

See A.2.b, B.1, B.3, and B.4 below.

2. Additional Terms and Conditions

- 2.a** The hourly mass emission limitations in term A.1 are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003 and P005 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

1. The VOC content of any coating used in this emissions unit shall not exceed 3.50 pounds of VOC per gallon, excluding water and exempt solvents, as applied.
2. The OC content of any cleanup material used in this emissions unit shall not exceed 6.69 pounds of OC per gallon, as applied.
3. Any cleanup material used in this emissions unit shall not contain any VOCs, as defined by OAC rule 3745-21-01(B)(6).
4. The total maximum annual coating usage shall not exceed 27,337 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.
5. The total maximum annual cleanup material usage shall not exceed 2500 gallons per year.

6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
7. This emissions unit shall be operated and maintained in accordance with the manufacturer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per the manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control.
8. The permittee shall maintain minimum stack height of thirty-three (33) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating, excluding water and exempt solvents, in pounds VOC per gallon coating, as applied;
 - c. the OC content of each cleanup material in pounds OC per gallon cleanup material, as applied;
 - d. the individual hazardous air pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - f. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from d);
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from e);
 - h. the total coating usage for the emissions unit, in gallons;
 - i. the total cleanup material usage for the emissions unit, in gallons;
 - j. the VOC emissions from all coating used in this emissions unit, in pounds or tons of VOC;

- k. the OC emissions from all cleanup material used in this emissions unit, in pounds or tons of OC;
- l. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP;
- m. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs;
- n. the rolling, 12-month summation of monthly coating usage, in gallons per rolling, 12-month period;
- o. the rolling, 12-month summation of the monthly VOC emissions from all coating, in pounds or tons per rolling, 12-month period;
- p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units K001, K002 and K003 combined, in pounds or tons per rolling, 12-month period (for each HAP the sum of d times h for each coating and the sum of e times i for each cleanup material); and
- q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units K001, K002 and K003 combined, in pounds or tons per rolling, 12-month period (the sum of f times h for each coating plus the sum of g times i for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 2. The permittee shall collect and record the following information each year for this emission unit:
 - a. the OC containing cleanup material usage for the emissions unit, in gallons; and
 - b. the OC emissions from all OC containing cleanup material used in this emissions unit, in pounds or tons of OC.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when this emissions unit was in operation.

Issued: To be entered upon final issuance

4. The permittee shall maintain daily records that document the date any cleanup material containing the VOCs was used and the quantity used.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing that the VOC content of any coating exceeded the applicable limitation. 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 exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the VOC content limit for coating material;
 - b. the rolling, 12-month coating usage limitation;
 - c. the rolling, 12-month VOC emission limitation;
 - d. the rolling, 12-month total individual HAP emission limitation from emissions units K001, K002 and K003 combined;
 - e. the rolling, 12-month total combined HAP emissions limitation from emissions units K001, K002 and K003 combined;
 - f. any time periods when the dry filtration system was not in service when this emissions unit was in operation; and
 - g. the date any cleanup material containing the VOCs was used and the quantity used.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

3. The permittee shall submit annual reports which specify the total VOC, OC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

Emissions Unit ID: **K001**

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
VOC emissions shall not exceed 35 pounds per hour from coating materials.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (10 gallons per hour, PTI application 01/14/2005) by the maximum VOC content of the coating (3.5 pounds VOC per gallon, PTI application 01/14/2005), in pounds VOC per gallon.
 - b. Emission Limitation:
OC emissions shall not exceed 6.59 pounds per hour and 8.24 tons per year from cleanup materials.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of cleanup material used per hour (1 gallon per hour, PTI application 01/14/2005) by the maximum OC content of the cleanup material (6.59 pounds OC per gallon, PTI application 01/14/2005), in pounds OC per gallon.

Compliance with the annual limitation shall be demonstrated by record keeping requirement C.2.b.
 - c. Emission Limitation:
VOC emissions shall not exceed 47.84 tons per rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.o.
 - d. Emission Limitation:
Single HAP emissions from K001, K002 and K003 combined shall not exceed 9.9 ton per rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.p.
 - e. Emission Limitation:
Total combined HAP emissions from K001, K002 and K003 combined shall not exceed 24.9 tons per year.

22

Worth

PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated by record keeping requirement C.1.q.

F. Miscellaneous Requirements

None

Worth

PTI A

Emissions Unit ID: **K002****Issued: To be entered upon final issuance****PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Pressure cylinder paint line (4BA) with infra-red oven (Terms in this permit supersede those identified in PTI 01-08579 issued on 08/13/2002 for this emissions unit)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating material. Organic compound (OC) emissions shall not exceed 6.59 pounds per hour and 8.24 tons per year from cleanup materials. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B), OAC rule 3745-31-05(C), and OAC rule 3745-21-09(U).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a below.
	OAC rule 3745-35-07(B) OAC rule 3745-31-05(C)	See B.1 below. VOC emissions shall not exceed 47.84 tons per year based on a rolling 12-month summation of monthly emissions. Single hazardous air pollutant (HAP) emissions from emissions units K001, K002 and K003 combined shall not exceed 9.9 ton per year based on a rolling 12-month summation of monthly emissions.

Worthington Cylinder Corp
PTI Application: 01-08027
Issued

Facility ID: 0125041404

Emissions Unit ID: K002

Total combined HAPs emissions from emissions units K001, K002 and K003 combined shall not exceed 24.9 tons per year based on a rolling 12-month summation of monthly emissions.

See A.2.b, B.1, B.3, and B.4 below.

2. Additional Terms and Conditions

- 2.a** The hourly mass emission limitations in term A.1 are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003 and P005 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

- 1. The VOC content of any coating used in this emissions unit shall not exceed 3.50 pounds of VOC per gallon, excluding water and exempt solvents, as applied.
- 2. The OC content of any cleanup material used in this emissions unit shall not exceed 6.69 pounds of OC per gallon, as applied.
- 3. Any cleanup material used in this emissions unit shall not contain any VOCs, as defined by OAC rule 3745-21-01(B)(6).
- 4. The total maximum annual coating usage shall not exceed 27,337 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and therefore does not need to be limited during the first year on a monthly basis.
- 5. The total maximum annual cleanup material usage shall not exceed 2500 gallons per year.

Issued: To be entered upon final issuance

6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
7. This emissions unit shall be operated and maintained in accordance with the manufacturer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per the manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control.
8. The permittee shall maintain minimum stack height of thirty-three (33) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating, excluding water and exempt solvents, in pounds VOC per gallon coating, as applied;
 - c. the OC content of each cleanup material in pounds OC per gallon cleanup material, as applied;
 - d. the individual hazardous air pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - f. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from d);
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from e);
 - h. the total coating usage for the emissions unit, in gallons;
 - i. the total cleanup material usage for the emissions unit, in gallons;
 - j. the VOC emissions from all coating used in this emissions unit, in pounds or tons of VOC;

Emissions Unit ID: **K002**

- k. the OC emissions from all cleanup material used in this emissions unit, in pounds or tons of OC;
- l. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP;
- m. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs;
- n. the rolling, 12-month summation of monthly coating usage, in gallons per rolling, 12-month period;
- o. the rolling, 12-month summation of the monthly VOC emissions from all coating, in pounds or tons per rolling, 12-month period;
- p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units K001, K002 and K003 combined, in pounds or tons per rolling, 12-month period (for each HAP the sum of d times h for each coating and the sum of e times i for each cleanup material); and
- q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units K001, K002 and K003 combined, in pounds or tons per rolling, 12-month period (the sum of f times h for each coating plus the sum of g times i for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 2. The permittee shall collect and record the following information each year for this emission unit:
 - a. the OC containing cleanup material usage for the emissions unit, in gallons; and
 - b. the OC emissions from all OC containing cleanup material used in this emissions unit, in pounds or tons of OC.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when this emissions unit was in operation.
- 4. The permittee shall maintain daily records that document the date any cleanup material containing

Issued: To be entered upon final issuance

the VOCs was used and the quantity used.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing that the VOC content of any coating exceeded the applicable limitation. 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 exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the VOC content limit for coating material;
 - b. the rolling, 12-month coating usage limitation;
 - c. the rolling, 12-month VOC emission limitation;
 - d. the rolling, 12-month total individual HAP emission limitation from emissions units K001, K002 and K003 combined;
 - e. the rolling, 12-month total combined HAP emissions limitation from emissions units K001, K002 and K003 combined;
 - f. any time periods when the dry filtration system was not in service when this emissions unit was in operation; and
 - g. the date any cleanup material containing the VOCs was used and the quantity used.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

3. The permittee shall submit annual reports which specify the total VOC, OC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this

permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:
VOC emissions shall not exceed 35 pounds per hour from coating materials.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (10 gallons per hour, PTI application 01/14/2005) by the maximum VOC content of the coating (3.5 pounds VOC per gallon, PTI application 01/14/2005), in pounds VOC per gallon.
- b. Emission Limitation:
OC emissions shall not exceed 6.59 pounds per hour and 8.24 tons per year from cleanup materials.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of cleanup material used per hour (1 gallon per hour, PTI application 01/14/2005) by the maximum OC content of the cleanup material (6.59 pounds OC per gallon, PTI application 01/14/2005), in pounds OC per gallon.

Compliance with the annual limitation shall be demonstrated by record keeping requirement C.2.b.
- c. Emission Limitation:
VOC emissions shall not exceed 47.84 tons per rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.o.
- d. Emission Limitation:
Single HAP emissions from K001, K002 and K003 combined shall not exceed 9.9 ton per rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.1.p.
- e. Emission Limitation:
Total combined HAP emissions from K001, K002 and K003 combined shall not exceed 24.9 tons per year.

Worth

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated by record keeping requirement C.1.q.

F. Miscellaneous Requirements

None

Worth

PTI A

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

Total combined HAPs emissions from emissions units K001, K002 and K003 combined shall not exceed 24.9 tons per year based on a rolling 12-month summation of monthly emissions.

See A.2.b, B.2, B.4 and B.5 below.

2. Additional Terms and Conditions

- 2.a** The hourly mass emission limitations in term A.1 are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003 and P005 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

1. The total maximum daily coating usage for this emissions unit (K003) shall not exceed 10 gallons per day.
2. The VOC content of any coating used in this emissions unit shall not exceed 5.20 pounds of VOC per gallon, excluding water and exempt solvents, as applied.
3. The OC content of any cleanup material used in this emissions unit shall not exceed 6.69 pounds of OC per gallon, as applied.
4. Any cleanup material used in this emissions unit shall not contain any VOCs, as defined by OAC rule 3745-21-01(B)(6).
5. The total maximum annual coating usage shall not exceed 952 gallons per rolling, 12-month summation of the coating usage figures. The permittee has existing coating usage records and

therefore does not need to be limited during the first year on a monthly basis.

6. The total maximum annual cleanup material usage shall not exceed 2000 gallons per year.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for this emissions unit each day:

- a. the name and identification of each coating employed, as applied;
- b. the volume¹, in gallons, of each coating employed; and
- c. the total volume¹, in gallons, of all coatings employed.

¹Any day where less than one gallon of coating is employed, a record which indicates that less than one gallon has been used is acceptable.

2. The permittee shall collect and record the following information each month for this emission unit:

- a. the name and identification number of each coating and cleanup material, as applied;
- b. the VOC content of each coating, excluding water and exempt solvents, in pounds VOC per gallon coating, as applied;
- c. the OC content of each cleanup material in pounds OC per gallon cleanup material, as applied;
- d. the individual hazardous air pollutant (HAP)² content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- f. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from d);
- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from e);
- h. the total coating usage for the emissions unit, in gallons;

Issued: To be entered upon final issuance

- i. the total cleanup material usage for the emissions unit, in gallons;
- j. the VOC emissions from all coating used in this emissions unit, in pounds or tons of VOC;
- k. the OC emissions from all OC containing cleanup material used in this emissions unit, in pounds or tons of OC;
- l. the total individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP;
- m. the total combined HAP emissions from all coating and cleanup material, in pounds or tons of total combined HAPs;
- n. the rolling, 12-month summation of monthly coating usage, in gallons per rolling, 12-month period;
- o. the rolling, 12-month summation of the monthly VOC emissions from all coating, in pounds or tons per rolling, 12-month period;
- p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units K001, K002 and K003 combined, in pounds or tons per rolling, 12-month period (for each HAP the sum of d times h for each coating and the sum of e times i for each cleanup material); and
- q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units K001, K002 and K003 combined, in pounds or tons per rolling, 12-month period (the sum of f times h for each coating plus the sum of g times i for each cleanup material).

²A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each year for this emission unit:
 - a. the OC containing cleanup material usage for the emissions unit, in gallons; and
 - b. the OC emissions from all OC containing cleanup material used in this emissions unit, in pounds or tons of OC.

Emissions Unit ID: **K003**

4. The permittee shall maintain daily records that document the date any cleanup material containing the VOCs was used and the quantity used.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the emissions unit employs more than the applicable maximum daily coating usage limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the VOC content limit for coating material;
 - b. the rolling, 12-month coating usage limitation;
 - c. the rolling, 12-month VOC emission limitation;
 - d. the rolling, 12-month total individual HAP emission limitation from emissions units K001, K002 and K003 combined;
 - e. the rolling, 12-month total combined HAP emissions limitation from emissions units K001, K002 and K003 combined; and
 - f. the date any cleanup material containing the VOCs was used and the quantity used.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

4. The permittee shall submit annual reports which specify the total VOC, OC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA Central District Office by April 15 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Issued: To be entered upon final issuance

- a. Emission Limitation:
VOC emissions shall not exceed 5.20 pounds per hour from coating materials.
- Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (1 gallon per hour, PTI application 12/01/2004) by the maximum VOC content of the coating (5.20 pounds VOC per gallon, PTI application 12/01/2004), in pounds VOC per gallon.
- b. Emission Limitation:
OC emissions shall not exceed 6.59 pounds per hour and 6.59 tons per year from cleanup materials.
- Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of cleanup material used per hour (1 gallon per hour, PTI application 12/01/2004) by the maximum OC content of the cleanup material (6.6 pounds OC per gallon, PTI application 12/01/2004), in pounds OC per gallon.
- Compliance shall be demonstrated by record keeping requirement C.3.b.
- c. Emission Limitation:
VOC emissions shall not exceed 2.48 tons per rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.2.o.
- d. Emission Limitation:
Single HAP emissions from K001, K002 and K003 combined shall not exceed 9.9 ton per rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.2.p.
- e. Emission Limitation:
Total combined HAP emissions from K001, K002 and K003 combined shall not exceed 24.9 tons per year.
- Applicable Compliance Method:
Compliance shall be demonstrated by record keeping requirement C.2.q.

Worthington Cylinder Corp
PTI Application: 01 08027
Issued

Facility ID: 0125041404

Emissions Unit ID: **K003**

F. Miscellaneous Requirements

None