

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install: **01-06362**

**A. Source Description**

The applicant, Evans Columbus LLC has submitted a PTI application for the administrative modification of three existing paint operations. These emissions units were previously permitted under PTI # 01-6362 issued on 2/24/99 and a Title V Operating Permit. The purpose of the coating line is to apply finishes in the manufacturing of steel drums.

**B. Facility Emissions and Attainment Status**

Franklin County is classified as nonattainment for the 8-hour ozone NAAQS and PM 2.5. Evans Columbus LLC is currently classified as a Title V facility for volatile organic compounds (VOC) and Hazardous Air Pollutants(HAP). Without synthetic minor limitations presented in this permit, potential emissions from the paint operations would trigger Title V permitting and MACT thresholds levels. The facility wide emissions (tons per year), *with the current synthetic minor limits* are:

	Facility Wide Pre-Synthetic Minor	Facility Wide Post Synthetic Minor
VOC	100.71	81.2
Individual HAP	34.03	9.9
Combined HAP	85.95	24.9

**C. Source Emissions**

Evans Columbus LLC has requested operational restrictions on coatings, solvents and cleanup material usage in order to ensure compliance with these limits:

21,500 gallons / yr of coatings @ 4.3 lbs VOC/gal per 12-month rolling summation, and

20,000 gallons / yr of coatings @ 3.5 lbs VOC/gal per 12-month rolling summation.

1,800 gallons / yr of cleanup @ 7.51 lbs VOC/gal per 12-month rolling summation.

Limiting the VOC and HAP emissions results in Evans Columbus LLC having a PTE below those levels which trigger Title V and or MACT permitting requirements.

**D. Conclusion**

The permit contains operational restrictions, record keeping and reporting requirements to ensure on going compliance with the emission limitations. Evans Columbus LLC will be considered a synthetic minor facility. Emissions of any single HAP will not exceed 9.99 tons and total HAP emissions will not exceed 24.99 tons per year. The synthetic minor will effectively restrict the volatile organic compounds and hazardous air pollutant emissions below Title V . Additionally, the federally enforceable limits included in the proposed PTI will allow Evans Columbus LLC to avoid MACT requirements.



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:** 01-06362

**Fac ID:** 0125041529

**DATE:** 11/14/2006

Evans Columbus LLC  
Ronald Evans  
1410 Blatt Boulevard  
Blacklick, OH 43004

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 01-06362 FOR AN AIR CONTAMINANT SOURCE FOR  
Evans Columbus LLC**

On 11/14/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Evans Columbus LLC**, located at **1410 Blatt Boulevard, Blacklick**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-06362:

**3 drum coating operations (modification).**

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]



STATE OF OHIO ENVIRONMENTAL PROTECTION  
AGENCY

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**Permit To Install  
Terms and Conditions**

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

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**DRAFT PERMIT TO INSTALL 01-06362**

Application Number: 01-06362  
Facility ID: 0125041529  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Evans Columbus LLC  
Person to Contact: Ronald Evans  
Address: 1410 Blatt Boulevard  
Blacklick, OH 43004

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1410 Blatt Boulevard  
Blacklick, Ohio**

Description of proposed emissions unit(s):  
**3 drum coating operations (modification).**

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

Evans Columbus LLC

Facility ID: 0125041529

PTI Application: 01-06362

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

Evans Columbus LLC

Facility ID: 0125041529

PTI Application: 01-06362

Issued: To be entered upon final issuance

reports shall be submitted (i.e., postmarked) quarterly, 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.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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,

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**Issued: To be entered upon final issuance**

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**

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 re-issuance, or modification
- 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, 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 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.

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**Issued: To be entered upon final issuance**

**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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**Issued: To be entered upon final issuance**

**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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit 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

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**Issued: To be entered upon final issuance**

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.

## **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 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.

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**Issued: To be entered upon final issuance**

**13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**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 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 (i.e., postmarked) quarterly, 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. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

**Evans Columbus LLC****Facility ID: 0125041529****PTI Application: 01-06362****Issued: To be entered upon final issuance**

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.

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

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 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.

Evans Columbus LLC

Facility ID: 0125041529

PTI Application: 01-06362

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**Evans Columbus LLC****Facility ID: 0125041529****PTI Application: 01-06362****Issued: To be entered upon final issuance****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	88.25
PE	2.69
NOx	4.53
SO2	0.03
CO	3.81
Individual HAP	< 9.9
Total HAP	< 24.9

**Evans Columbus LLC**

**Facility ID: 0125041529**

**PTI Application: 01-06362**

**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

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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.

**Operations, Property, and/or Equipment - (K001) - Drum Lining Line ( Two drum lining spray booths).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3) (Modification)	Volatile organic compound (VOC) emissions from the application of coatings in this emissions unit shall not exceed 64.5 pounds per hour.  VOC emissions from the application of coatings and cleanup materials in this emissions unit shall not exceed 52.98 tons per year.  Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), 3745-35-07(B), and 3745-21-09(U)(1)(e).  Emissions from natural gas usage in the associated oven shared by K001 and K003 combined shall not exceed:  0.72 lbs NOx/hr; 3.15 tons NOx/yr; 0.004 lb SO2/hr; 0.02 ton SO2/yr; 0.605 lb CO/hr; 2.65 tons CO/yr; 0.055 lb PM/hr; 0.24 ton PM/yr; 0.040 lb VOC/hr; and 0.17 ton VOC/yr
OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pounds per hour, based on Table I.

Emissions Unit ID: K001

<p>OAC rule 3745-17-07 (A)(1) 38</p>	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
<p>OAC rule 3475-21-09 (U)(1)(e)</p>	<p>4.3 pounds VOC / gallon of coating, excluding water and exempt solvents.</p>
<p>OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V)</p>	<p>VOC emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 88.0 tons per rolling, 12-month period.</p>
<p>OAC rule 3745-31-05 (C) (Synthetic Minor to avoid MACT)</p>	<p>Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 9.9 tons per rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.</p> <p>See A.II.2 and A.II.3 below.</p>

**2. Additional Terms and Conditions**

- 2.a** The hourly VOC emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to dry filtration. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

**II. Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2. The maximum annual coating usage for emissions units K001, K002, and K003 shall not exceed 21,500 gallons for coatings with a maximum VOC content of 4.3 pounds per gallon and 20,000 gallons for coatings with a maximum VOC content of 3.5 pounds per gallon, based upon a rolling, 12-month summation of coating usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

- 3. The maximum annual cleanup material usage for emissions units K001, K002, and

**Issued: To be entered upon final issuance**

K003 shall not exceed 1,800 gallons, based upon a rolling, 12-month summation of cleanup/solvent material usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup/solvent material usage, upon issuance of this permit.

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

1. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, and P003:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating, as applied;
  - c. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - d. 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 c);
  - e. the number of gallons of each coating employed;
  - f. the name and identification of each cleanup/solvent material employed;
  - g. the VOC content of each cleanup/solvent material employed
  - h. the individual HAP content for each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
  - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h);
  - j. the number of gallons of each cleanup/solvent material employed;
  - k. the total VOC emissions from all coating and cleanup/solvent materials, in pounds or tons per rolling, 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup/solvent material);
  - l. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c times e for each coating and the sum of h times j for each cleanup/solvent material); and
  - m. the total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times e for each coating plus the sum of i times j for each cleanup/solvent material).

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can

Emissions Unit ID: K001

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 day for emissions unit K001:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

#### IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings ( i.e. for VOC content). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the 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 has occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 12-month coating usage limitation;
  - b. the rolling, 12-month cleanup/solvent usage limitation;
  - c. the rolling, 12-month VOC emission limitation;
  - d. the rolling, 12-month total individual HAP emission limitation; and
  - e. the rolling, 12-month total combined HAP emissions limitation;

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit annual reports by April 15th each year which specify the VOC, individual and combined HAP emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

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**V. 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 methods:

1.a Emission Limitation: 4.3 pounds VOC/gallon of coating (excluding water and exempt solvents).

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation: VOC emissions from the application of coatings of this emissions unit shall not exceed 64.5 pounds per hour.

Applicable Compliance Method: Compliance may be based upon multiplying the maximum hourly coating usage (6.72 gal/hr) by the maximum VOC content of the coating (4.3 lbs/gal).

1.c Emission Limitation: VOC emissions from the application of coatings and cleanup/solvent materials shall not exceed 52.98 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.K of this permit.

1.d Emission Limitation:  
Particulate emissions shall not exceed 0.551 pounds per hour.

Applicable Compliance Method:  
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate emissions rate (lbs/hr)}$

$= \text{maximum coating solids usage rate in pounds per hour of } 34.9 \text{ lbs/hr} \times (1-TE)$

Emissions Unit ID: K001

X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (70% according to the permit application).

CE = control efficiency of the control equipment (assumed to be 98%)  
If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

- 1.e Emission Limitation: Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.

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Applicable Compliance Method:

Compliance shall be demonstrated by summing the annual PE for each coating booth, K001, K002 and K003. To determine the annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:  
E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.1.e of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (70% according to the permit application).

CE = control efficiency of the control equipment (assumed to be 98%)  
If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to the permit application).

- 1.f Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

- 1.g Emission Limitation: VOC emissions from the application of coatings and cleanup / solvent from emissions units K001, K002, K003, and P003 shall not exceed 88.0 tons per rolling 12-month

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.k of this permit.

- 1.h Emission Limitation:  
Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.

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Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.l and A.III.1.m of this permit.

- 1.i Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.72 lbs NO<sub>x</sub>/hr

Applicable Compliance Method: Compliance with the allowable mass emission rate for NO<sub>x</sub> emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 100 lb of NO<sub>x</sub>/mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

- 1.j Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.605 lb CO/hr

Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 84 lb of CO /mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98).If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

- 1.k Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.004 lb SO<sub>2</sub>/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for SO<sub>2</sub> emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 0.6 lb of SO<sub>2</sub>/mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

Emissions Unit ID: K001

Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

- 1.l Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.040 lb VOC/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

- 1.m Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.055 lb PM/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for PM emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 7.6 lb of PM /mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.n Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed 0.24 ton of PM/yr; Emissions from natural gas usage in the associated oven shall not exceed 0.02 ton of SO<sub>2</sub>/yr; Emissions from natural gas usage in the associated oven shall not exceed 0.17 ton of VOC/yr; Emissions from natural gas usage in the associated oven shall not exceed 3.15 tons of NO<sub>x</sub>/yr; Emissions from natural gas usage in the associated oven shall not exceed 2.65 tons of CO/yr.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and

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then dividing by 2000).

Emissions Unit ID: K001

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**B. State Only Enforceable Section**

**I. 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.

**Operations, Property, and/or Equipment - (K001) - Drum Lining Line ( Two drum lining spray booths).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Ohio Air Toxic Policy	See B.III below.

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit K001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 3.50

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m<sup>3</sup>):

Emissions Unit ID: K001

393.49

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 8.30

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
931.25

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,880.95

Pollutant: Phenol

TLV (mg/m3): 19

Maximum Hourly Emission Rate (lbs/hr): 3.62

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
406.60

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 452.38

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 21.84

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
2,516.05

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047.62

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g.,

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increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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.

**Operations, Property, and/or Equipment - (K002) - Exterior drum coating line ( spray paint booth and one 3.15 mmBtu/hr baking oven).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3) (Modification)	<p>                         Volatile organic compound (VOC) emissions from the application of coatings in this emissions unit shall not exceed 24.5 pounds per hour.                     </p> <p>                         VOC emissions from the application of coatings and cleanup materials in this emissions unit shall not exceed 41.75 tons per year.                     </p> <p>                         Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.                     </p> <p>                         The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), 3745-35-07(B), and 3745-21-09(U)(1)(e).                     </p> <p>                         Emissions from natural gas usage in the associated oven shall not exceed:                     </p> <ul style="list-style-type: none"> <li>0.32 lbs NOx/hr;</li> <li>1.38 tons NOx/yr;</li> <li>0.002 lb SO2/hr;</li> <li>0.01 ton SO2/yr;</li> <li>0.27 lb CO/hr;</li> <li>1.16 tons CO/yr;</li> <li>0.03 lb PM/hr;</li> <li>0.10 ton PM/yr;</li> <li>0.02 lb VOC/hr; and</li> <li>0.08 ton VOC/yr</li> </ul>

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OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pounds per hour, based on Table I.
OAC rule 3745-17-07 (A)(1) 38	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3475-21-09 (U)(1)(f)	3.5 pounds VOC / gallon of coating, excluding water and exempt solvents. 10
OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V)  OAC rule 3745-31-05 (C) (Synthetic Minor to avoid MACT)	VOC emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 88.0 tons per rolling, 12-month period.  Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 9.9 tons per rolling, 12-month period.  Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.  See A.II.2. and A.II.3 below.

**2. Additional Terms and Conditions**

- 2.a** The hourly VOC emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to dry filtration. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

**II. Operational Restrictions**

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- The maximum annual coating usage for emissions units K001, K002, and K003 shall not exceed 21,500 gallons for coatings with a maximum VOC content of 4.3 pounds per gallon and 20,000 gallons for coatings with a maximum VOC content of 3.5 pounds per

Emissions Unit ID: K002

gallon, based upon a rolling, 12-month summation of coating usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

3. The maximum annual cleanup material usage for emissions units K001, K002, and K003 shall not exceed 1,800 gallons, based upon a rolling, 12-month summation of cleanup/solvent material usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup/solvent material usage, upon issuance of this permit.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, and P003:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating, as applied;
  - c. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - d. 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 c);
  - e. the number of gallons of each coating employed;
  - f. the name and identification of each cleanup/solvent material employed;
  - g. the VOC content of each cleanup/solvent material employed
  - h. the individual HAP content for each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
  - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h);
  - j. the number of gallons of each cleanup/solvent material employed;
  - k. the total VOC emissions from all coating and cleanup/solvent materials, in pounds or tons per rolling, 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup/solvent material);
  - l. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c times e for each coating and the sum of h times j for each cleanup/solvent material); and
  - m. the total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times e for each coating plus the sum of i times j for each cleanup/solvent material).

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<sup>1</sup>A 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 day for emissions unit K002:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,<sup>2</sup>.

**IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings ( i.e. for VOC content). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calender month.
2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the 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 has occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 12-month coating usage limitation;
  - b. the rolling, 12-month cleanup/solvent usage limitation;
  - c. the rolling, 12-month VOC emission limitation;
  - d. the rolling, 12-month total individual HAP emission limitation; and
  - e. the rolling, 12-month total combined HAP emissions limitation;

**Evans Columbus LLC****DTL Application: 01 06262****Facility ID: 0125041529**

Emissions Unit ID: K002

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit annual reports by April 15th each year which specify the VOC, individual and combined HAP emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

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**V. 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 methods:

1.a Emission Limitation: 3.5 pounds VOC/gallon of coating (excluding water and exempt solvents).

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation: VOC emissions from the application of coatings of this emissions unit shall not exceed 24.5 pounds per hour.

Applicable Compliance Method: Compliance may be based upon multiplying the maximum hourly coating usage (13.8 gal/hr) by the maximum VOC content of the coating (3.5 lbs/gal).

1.c Emission Limitation: VOC emissions from the application of coatings and cleanup/solvent materials shall not exceed 41.75 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.k of this permit.

1.d Emission Limitation:  
Particulate emissions shall not exceed 0.551 pounds per hour.

Applicable Compliance Method:  
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate emissions rate (lbs/hr)}$

$= \text{maximum coating solids usage rate in pounds per hour of } 34.9 \text{ lbs/hr} \times (1-TE) \times (1-CE)$

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TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (70% according to the permit application).

CE = control efficiency of the control equipment (assumed to be 98%)  
If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

- 1.e Emission Limitation: Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the annual PE for each coating booth, K001, K002 and K003. To determine the annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:  
 $E = \text{particulate emissions rate (tons/yr)}$

$= \text{maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.1.e of this permit by the coating density and then by the weight \% solids of the coating) X (1-TE) X (1-CE)}$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (70% according to the permit application).

CE = control efficiency of the control equipment (assumed to be 98%)  
If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to the permit application).

- 1.f Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

- 1.g Emission Limitation: VOC emissions from the application of coatings and cleanup / solvent from emissions units K001, K002, K003, and P003 shall not exceed 88.0 tons per rolling 12-month

Emissions Unit ID: K002

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.k of this permit.

1.h Emission Limitation:

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.l and A.III.1.m of this permit.

1.i Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.32 lbs NOx/hr

Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated oven 's maximum hourly fuel usage of 0.00315 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

1.j Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.27 lb CO/hr

Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 84 lb of CO /mmscf by the associated oven 's maximum hourly fuel usage of 0.00315 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

1.k Emission Limitation: Emissions from natural gas usage in the associated oven

**Issued: To be entered upon final issuance**

shall not exceed:  
0.002 lb SO<sub>2</sub>/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for SO<sub>2</sub> emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 0.6 lb of SO<sub>2</sub>/mmscf by the associated oven 's maximum hourly fuel usage of 0.00315 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

- 1.l Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.020 lb VOC/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated oven 's maximum hourly fuel usage of 0.00315 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

- 1.m Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.03 lb PM/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for PM emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 7.6 lb of PM /mmscf by the associated oven 's maximum hourly fuel usage of 0.00315 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests

Emissions Unit ID: K002

performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.n Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed 0.10 ton of PM/yr; Emissions from natural gas usage in the associated oven shall not exceed 0.01 ton of SO<sub>2</sub>/yr; Emissions from natural gas usage in the associated oven shall not exceed 0.08 ton of VOC/yr; Emissions from natural gas usage in the associated oven shall not exceed 1.38 tons of NO<sub>x</sub>/yr; Emissions from natural gas usage in the associated oven shall not exceed 1.16 tons of CO/yr.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

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**B. State Only Enforceable Section**

**I. 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.

**Operations, Property, and/or Equipment - (K002) - Exterior drum coating line ( spray paint booth and one 3.15 mmBtu/hr baking oven).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Ohio Air Toxic Policy	See B.III below

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit K001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.50

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Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
393.49

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 8.30

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
931.25

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,880.95

Pollutant: Phenol

TLV (mg/m3): 19

Maximum Hourly Emission Rate (lbs/hr): 3.62

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
406.60

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 452.38

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 21.84

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
2,516.05

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047.62

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

Emissions Unit ID: K002

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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.

**Operations, Property, and/or Equipment - (K003) - Lid and Bottom Coating (Two Paint Booths)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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<p>OAC rule 3745-31-05(A)(3) (Modification)</p>	<p>Volatile organic compound (VOC) emissions from the application of coatings in this emissions unit shall not exceed 25.8 pounds per hour.</p> <p>VOC emissions from the application of coatings and cleanup materials in this emissions unit shall not exceed 52.98 tons per year.</p> <p>Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), 3745-35-07(B), and 3745-21-09(U)(1)(e).</p> <p>Emissions from natural gas usage in the associated oven shared by K001 and K003 combined shall not exceed:</p> <p>0.72 lbs NOx/hr;  3.15 tons NOx/yr;  0.004 lb SO<sub>2</sub>/hr;  0.02 ton SO<sub>2</sub>/yr;  0.605 lb CO/hr;  2.65 tons CO/yr;  0.055 lb PM/hr;  0.24 ton PM/yr;  0.040 lb VOC/hr; and  0.17 ton VOC/yr</p>
<p>OAC rule 3745-17-11(B)(1)</p>	<p>Particulate emissions shall not exceed 0.551 pounds per hour, based on Table I.</p>
<p>OAC rule 3745-17-07 (A)(1) 38</p>	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
<p>OAC rule 3475-21-09 (U)(1)(e) 380210</p>	<p>4.3 pounds VOC / gallon of coating, excluding water and exempt solvents. 10</p>

Emissions Unit ID: K003

<p>OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V)</p>	<p>Volatile Organic Compound(VOC) emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 88.0 tons per rolling, 12-month period.</p>
<p>OAC rule 3745-31-05 (C) (Synthetic Minor to avoid MACT)</p>	<p>Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 9.9 tons per rolling, 12-month period.</p>
	<p>Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.</p>
	<p>See A.II.2 and A.II.3 below.</p>

**2. Additional Terms and Conditions**

- 2.a** The hourly VOC emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to dry filtration. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

**II. Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2. The maximum annual coating usage for emissions units K001, K002, and K003 shall not exceed 21,500 gallons for coatings with a maximum VOC content of 4.3 pounds per gallon and 20,000 gallons for coatings with a maximum VOC content of 3.5 pounds per gallon, based upon a rolling, 12-month summation of coating usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

- 3. The maximum annual cleanup material usage for emissions units K001, K002, and K003 shall not exceed 1,800 gallons, based upon a rolling, 12-month summation of cleanup/solvent material usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the

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permittee has existing records to generate the rolling, 12-month summation of the cleanup/solvent material usage, upon issuance of this permit.

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

1. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, and P003:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating, as applied;
  - c. the individual HAP<sup>1</sup> content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - d. 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 c);
  - e. the number of gallons of each coating employed;
  - f. the name and identification of each cleanup/solvent material employed;
  - g. the VOC content of each cleanup/solvent material employed
  - h. the individual HAP content for each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
  - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h);
  - j. the number of gallons of each cleanup/solvent material employed;
  - k. the total VOC emissions from all coating and cleanup/solvent materials, in pounds or tons per rolling, 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup/solvent material);
  - l. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c times e for each coating and the sum of h times j for each cleanup/solvent material); and
  - m. the total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times e for each coating plus the sum of i times j for each cleanup/solvent material).

<sup>1</sup>A 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

Emissions Unit ID: K003

on a line-by-line basis.

2. The permittee shall collect and record the following information each day for emissions unit K003:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

#### IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings ( i.e. for VOC content). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the 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 has occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 12-month coating usage limitation;
  - b. the rolling, 12-month cleanup/solvent usage limitation;
  - c. the rolling, 12-month VOC emission limitation;
  - d. the rolling, 12-month total individual HAP emission limitation; and
  - e. the rolling, 12-month total combined HAP emissions limitation;

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit annual reports by April 15th each year which specify the VOC, individual and combined HAP emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

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**V. 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 methods:

1.a Emission Limitation: 4.3 pounds VOC/gallon of coating (excluding water and exempt solvents).

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation: VOC emissions from the application of coatings of this emissions unit shall not exceed 25.8 pounds per hour.

Applicable Compliance Method: Compliance may be based upon multiplying the maximum hourly coating usage (2.75 gal/hr) by the maximum VOC content of the coating (4.3 lbs/gal).

1.c Emission Limitation: VOC emissions from the application of coatings and cleanup/solvent materials shall not exceed 52.98 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.k of this permit.

1.d Emission Limitation:  
Particulate emissions shall not exceed 0.551 pounds per hour.

Applicable Compliance Method:  
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate emissions rate (lbs/hr)}$

$= \text{maximum coating solids usage rate in pounds per hour of } 34.9 \text{ lbs/hr} \times (1-TE) \times (1-CE)$

Emissions Unit ID: K003

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (70% according to the permit application).

CE = control efficiency of the control equipment (assumed to be 98%)  
If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

- 1.e Emission Limitation: Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the annual PE for each coating booth, K001, K002 and K003. To determine the annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:  
E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.1.e of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (70% according to the permit application).

CE = control efficiency of the control equipment (assumed to be 98%)  
If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to the permit application).

- 1.f Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

- 1.g Emission Limitation: VOC emissions from the application of coatings and cleanup / solvent from emissions units K001, K002, K003, and P003 shall not exceed 88.0 tons per rolling 12-month

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.k of this permit.

- 1.h Emission Limitation:

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Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1.l and A.III.1.m of this permit.

- 1.i Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.72 lbs NOx/hr

Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

- 1.j Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.605 lb CO/hr

Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 84 lb of CO /mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98).If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

- 1.k Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:

Emissions Unit ID: K003

0.004 lb SO<sub>2</sub>/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for SO<sub>2</sub> emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 0.6 lb of SO<sub>2</sub>/mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

- 1.l Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.040 lb VOC/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

- 1.m Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed:  
0.055 lb PM/hr

Applicable Compliance Method: Applicable Compliance Method: Compliance with the allowable mass emission rate for PM emissions from the natural gas usage in the associated oven may be determined by multiplying an emission factor of 7.6 lb of PM /mmscf by the associated oven 's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.n Emission Limitation: Emissions from natural gas usage in the associated oven shall not exceed 0.24 ton of PM/yr; Emissions from natural gas usage in the associated oven shall not exceed 0.02 ton of SO<sub>2</sub>/yr; Emissions from natural gas

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usage in the associated oven shall not exceed 0.17 ton of VOC/yr; Emissions from natural gas usage in the associated oven shall not exceed 3.15 tons of NOx/yr; Emissions from natural gas usage in the associated oven shall not exceed 2.65 tons of CO/yr.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. 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.

**Operations, Property, and/or Equipment - (K003) - Lid and Bottom Coating (Two Paint Booths)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Ohio Air Toxic Policy	See B.III below.

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit K001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 3.50

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m<sup>3</sup>):

Emissions Unit ID: K003

393.49

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 8.30

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
931.25

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,880.95

Pollutant: Phenol

TLV (mg/m3): 19

Maximum Hourly Emission Rate (lbs/hr): 3.62

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
406.60

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 452.38

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 21.84

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):  
2,516.05

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047.62

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g.,

**Issued: To be entered upon final issuance**

increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None