



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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

1/12/2010

THOMAS LANGHALS  
COLONIAL SURFACE SOLUTIONS INC  
4599 CAMPBELL ROD  
COLUMBUS GROVE, OH 45830

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0302000208  
Permit Number: P0086616  
Permit Type: Renewal  
County: Allen

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

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

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

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

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

Sincerely,

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

Cc: Ohio EPA-NWDO





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

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
COLONIAL SURFACE SOLUTIONS INC**

Facility ID: 0302000208  
Permit Number: P0086616  
Permit Type: Renewal  
Issued: 1/12/2010  
Effective: 1/12/2010  
Expiration: 1/12/2020





**Air Pollution Permit-to-Install and Operate**  
for  
**COLONIAL SURFACE SOLUTIONS INC**

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0086616  
**Facility ID:** 0302000208  
**Effective Date:** 1/12/2010

# Authorization

Facility ID: 0302000208  
Application Number(s): A0017380  
Permit Number: P0086616  
Permit Description: Renewal PTIO for miscellaneous metals coating operation (farm equipment, buckets) and abrasive blasting operations  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/12/2010  
Effective Date: 1/12/2010  
Expiration Date: 1/12/2020  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

COLONIAL SURFACE SOLUTIONS INC  
4599 CAMPBELL ROAD  
Columbus Grove, OH 45830

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0086616  
Permit Description: Renewal PTIO for miscellaneous metals coating operation (farm equipment, buckets) and abrasive blasting operations

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

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	Paint Room
Superseded Permit Number:	03-13822
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Paint conveyORIZED line with a paint booth
Superseded Permit Number:	03-13822
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Grit blasting operation
Superseded Permit Number:	03-13822
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Sand blasting operation
Superseded Permit Number:	03-13822
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0086616  
**Facility ID:** 0302000208  
**Effective Date:** 1/12/2010

## **A. Standard Terms and Conditions**



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

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

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

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

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

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

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

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

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

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

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

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



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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0086616  
**Facility ID:** 0302000208  
**Effective Date:** 1/12/2010

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0086616  
**Facility ID:** 0302000208  
**Effective Date:** 1/12/2010

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0086616  
**Facility ID:** 0302000208  
**Effective Date:** 1/12/2010

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



**1. K001, Paint Room**

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

Paint Room

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. d)(4) through d)(6).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	60.0 lbs organic compounds (OC)/day and 10.95 tons OC/yr from coating usage  60.72 lbs OC/month and 0.36 tons OC/yr from cleanup operations
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)b.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

- (2) Additional Terms and Conditions
  - a. This emissions unit is exempt from the visible particulate emission limitations as specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h)



because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

- b. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 of OAC rule 3745-17-11 does not apply since the facility is located in Allen County, which is identified as a P-1 county.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of each coating as applied; and
  - d. the OC content of each coating, as applied, in pounds per gallon.
- (2) The permittee shall collect and record the following information on a monthly basis:
  - a. the name and identification number of each cleanup material employed;
  - b. the total volume, in gallons, of each cleanup material employed;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the total OC emissions from each cleanup material, in pounds per month\* [sum of d)(2)b. x d)(2)c.]; and
  - e. the annual year to date OC emissions from the cleanup material usage [sum of d)(2)d. for each calendar month to date from January to December];

\*The permittee may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.



- (3) The permittee shall, in conjunction with the information required in d)(1), collect and record the following information each month for purposes of determining annual OC emissions:
  - a. the total OC emissions from each coating, as applied [d)(1)c. x d)(1)d.]; and
  - b. the total combined OC emissions [tons per month and total tons, to date] for the calendar year from the coatings, as applied [summation of d)(3)a.].

- (4) The Permit to Install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Talc

TLV (ug/m3): 2,000

Maximum Hourly Emission Rate (lbs/hr): 2.20

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 47.16

MAGLC (ug/m3): 47.62

- (5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and



- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy.”
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitation: 60.0 lbs OC/day from coating usage



Applicable Compliance Method: The daily OC emission limitation is based on the emissions unit's potential to emit\*. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on the maximum usage rate of 10 gallons of coating per day and a maximum OC content of 6.00 pounds per gallon.

- b. Emission Limitation: 10.95 tons OC/year from coating usage

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section d)(3).

- c. Emission Limitation: 60.72 lbs OC/month from cleanup operations

Applicable Compliance Method: Compliance with the above limitation shall be based upon the record keeping requirements specified in section d)(2).

- d. Emission Limitation: 0.36 tons OC/year from cleanup operations

Applicable Compliance Method: The annual OC emission limitations from the use of cleanup materials shall be based upon record keeping requirements specified in section d)(2).

- g) Miscellaneous Requirements

- (1) None.



**2. K002, Paint conveyorized line with a paint booth**

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

Paint conveyorized line with a paint booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. d)(4) through d)(6).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	52.5 lbs organic compounds (OC)/day and 9.58 tons OC/yr from coating usage  95.22 lbs OC/month and 0.57 tons OC/yr from cleanup operations
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)b.
d.	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents

- (2) Additional Terms and Conditions
  - a. This emissions unit is exempt from the visible particulate emission limitations as specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h)



because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

- b. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 of OAC rule 3745-17-11 does not apply since the facility is located in Allen County, which is identified as a P-1 county.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line:

- a. the name and identification number of each coating employed;
- b. the volume, in gallons, of each coating employed;
- c. the total volume, in gallons, of each coating as applied; and
- d. the OC content of each coating, as applied, in pounds per gallon.

- (2) The permittee shall collect and record the following information on a monthly basis:

- a. the name and identification number of each cleanup material employed;
- b. the total volume, in gallons, of each cleanup material employed;
- c. the OC content of each cleanup material employed, in pounds per gallon;
- d. the total OC emissions from each cleanup material, in pounds per month\* [sum of d)(2)b. x d)(2)c.]; and
- e. the annual year to date OC emissions from the cleanup material usage [sum of d)(2)d. for each calendar month to date from January to December];

\*The permittee may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.



- (3) The permittee shall, in conjunction with the information required in d)(1), collect and record the following information each month for purposes of determining annual OC emissions:
  - a. the total OC emissions from each coating, as applied [d)(1)c. x d)(1)d.]; and
  - b. the total combined OC emissions [tons per month and total tons, to date] for the calendar year from the coatings, as applied [summation of d)(3)a.].
  
- (4) The Permit to Install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl n-amyl Ketone

TLV (ug/m3): 233,497

Maximum Hourly Emission Rate (lbs/hr): 4.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190.2

MAGLC (ug/m3): 5,559.5

Pollutant: Barium Sulfate

TLV (ug/m3): 10,000

Maximum Hourly Emission Rate (lbs/hr): 4.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190.2

MAGLC (ug/m3): 238.10

Pollutant: Titanium dioxide

TLV (ug/m3): 10,000

Maximum Hourly Emission Rate (lbs/hr): 2.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94.90

MAGLC (ug/m3): 238.10

- (5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.
- (6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.



e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitation: 52.5 lbs OC/day from coating usage  
Applicable Compliance Method: The daily OC emission limitation is based on the emissions unit's potential to emit\*. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.  
  
\*The potential to emit is based on the maximum usage rate of 15 gallons of coating per day and a maximum OC content of 3.5 pounds per gallon.
  - b. Emission Limitation: 9.58 tons OC/year from coating usage  
Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section d)(3).
  - c. Emission Limitation: 95.22 lbs OC/month from cleanup operations  
Applicable Compliance Method: Compliance with the above limitation shall be based upon the record keeping requirements specified in section d)(2).
  - d. Emission Limitation: 0.57 tons OC/year from cleanup operations
  - e. Applicable Compliance Method: The annual OC emission limitations from the use of cleanup materials shall be based upon record keeping requirements specified in section d)(2).

g) Miscellaneous Requirements

- (1) None.



**3. P001, Grit blasting operation**

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

Grit blasting operation

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	1.64 lbs particulate emissions (PE)/hr and 7.17 tons PE/yr  Visible PE from this emission unit shall not exceed 10% opacity, as a three-minute average  Use of Best Available Control Measures [See b)(2)a.]
b.	OAC rule 3745-17-07(B)	None [See b)(2)b.]
c.	OAC rule 3745-17-08(B)	None [See b)(2)c.]



(2) Additional Terms and Conditions

- a. The permittee shall employ the following Best Available Control Measures for this emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ the following control measures to ensure compliance:
  - i. all grit blasting operations shall be conducted within an enclosure;
  - ii. baghouse shall be used as control equipment; and
  - iii. upon completion of daily grit blasting operations, the company shall clean up and properly dispose of all grit blasting wastes to prevent the material from becoming airborne.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. Colonial Sandblasting, Inc. is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

c) Operational Restrictions

- (1) The maximum annual abrasive material usage in this emission unit shall not exceed 7,884 tons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for visible fugitive emissions from the grit blasting enclosure. The presence or absence of visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.



- (2) The permittee shall collect and record the following information for the abrasive material usage in emissions unit P001:
  - a. the monthly abrasive material usage employed, in tons per month; and
  - b. the annual, year to date abrasive material usage employed [sum of d)(2)a.] for each calendar month to date from January to December), in tons per year.
- e) Reporting Requirements
  - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
    - a. all days during which any visible fugitive particulate emissions were observed from this emission unit; and
    - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- f) Testing Requirements
  - (1) Compliance with the emission limitations specified in section b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitation: 1.64 lbs PE/hr  
Applicable Compliance Method: The permittee shall demonstrate compliance by multiplying the maximum throughput of the emissions unit (1,800 lbs abrasive material/hr) by the appropriate emission factor from AP-42 Chapter 13.2.6 (9/97) (91 lbs PE/1000 lbs of abrasive material) and applying a 99% control efficiency from the baghouse.
    - b. Emission Limitation: 7.17 tons PE/yr  
Applicable Compliance Method: The permittee shall demonstrate compliance by multiplying the restricted throughput of abrasive material (7,884 TPY) by the appropriate emission factor from AP-42 Chapter 13.2.6 (9/97) (91 lbs PE/1000 lbs of abrasive material) and applying a 99% control efficiency from the baghouse. Compliance shall also be demonstrated through the monitoring and record keeping requirements specified in section d)(2) of this permit.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0086616

**Facility ID:** 0302000208

**Effective Date:** 1/12/2010

- c. Emission Limitation: Visible particulate emissions from this emission unit shall not exceed 10% opacity, as a three-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.



**4. P002, Sand blasting operation**

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

Sand blasting operation

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.14 lb particulate emissions (PE)/hr and 0.60 ton PE/yr  Visible PE from this emission unit shall not exceed 10% opacity, as a three-minute average  Use of Best Available Control Measures [See b)(2)a.]
b.	OAC rule 3745-17-07(B)	None [See b)(2)b.]
c.	OAC rule 3745-17-08(B)	None [See b)(2)c.]

(2) Additional Terms and Conditions

a. The permittee shall employ the following Best Available Control Measures for this emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ the following control measures to ensure compliance:



- i. all sand blasting operations shall be conducted within an enclosure;
    - ii. baghouse shall be used as control equipment; and
    - iii. upon completion of daily sand blasting operations, the company shall clean up and properly dispose of all sand blasting wastes to prevent the material from becoming airborne.
  - b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
  - c. Colonial Sandblasting, Inc. is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- c) Operational Restrictions
  - (1) The maximum annual abrasive material usage in this emission unit shall not exceed 657 tons.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for visible fugitive emissions from the sand blasting enclosure. The presence or absence of visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the visible emissions.
  - (2) The permittee shall collect and record the following information for the abrasive material usage in emissions unit P002:
    - a. the monthly abrasive material usage employed, in tons per month; and
    - b. the annual, year to date abrasive material usage employed [sum of d)(2)a.] for each calendar month to date from January to December), in tons per year.
- e) Reporting Requirements
  - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee



shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible fugitive particulate emissions were observed from this emission unit; and
  - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.14 lb PE/hr

Applicable Compliance Method: The permittee shall demonstrate compliance by multiplying the maximum throughput of the emissions unit (150 lbs abrasive material/hr) by the appropriate emission factor from AP-42 Chapter 13.2.6 (9/97) (91 lbs PE/1000 lbs of abrasive material) and applying a 99% control efficiency from the baghouse.

- b. Emission Limitation: 0.60 ton PE/yr

Applicable Compliance Method: The permittee shall demonstrate compliance by multiplying the restricted throughput of abrasive material (657 TPY) by the appropriate emission factor from AP-42 Chapter 13.2.6 (9/97) (91 lbs PE/1000 lbs of abrasive material) and applying a 99% control efficiency from the baghouse. Compliance shall also be demonstrated through the monitoring and record keeping requirements specified in section d)(2) of this permit.

- c. Emission Limitation: Visible particulate emissions from this emission unit shall not exceed 10% opacity, as a three-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.