

Synthetic Minor Determination and/or Netting Determination

Permit To Install 01-08742

A. Source Description

Amtekco applies solvent based-adhesive for pre-lamination of furniture parts (R001) and solvent-based stains and coatings in to furniture parts in 2 spray booths (R002, R003).

B. Facility Emissions and Attainment Status

Amtekco reported a PTE of 68 tons OC, 5.9 tons toluene and 4.1 tons MEK in this application. Franklin County is an attainment area for all criteria pollutants.

C. Source Emissions

Amtekco reported facility-wide actual emissions of 19.5 tons OC, 1.4 tons toluene and 0.63 ton MEK during 2001. This permit limits facility emissions to 68.3 tons OC, 9.9 tons single HAP and 24.9 tons combined HAPs per rolling, 12-month period.

D. Conclusion

The monitoring, record keeping and reporting requirements in this permit will effective limit emissions to less than 9.9 tons single HAP and 24.9 tons combined HAPs during any rolling, 12-month period. As a result emissions from this facility will be below the threshold subject to Title V permitting and the wood coating MACT standard.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-08742**

CERTIFIED MAIL

DATE: 9/25/2003

Amtekco Industries Inc
Ron Fishking
1675 South High Street
Columbus, OH 43207

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 **\$1000** 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.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

FRANKLIN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08742 FOR AN AIR CONTAMINANT SOURCE FOR
AMTEKCO INDUSTRIES INC**

On 9/25/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Amtekco Industries Inc**, located at **1675 South High Street, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08742:

Pre lamination process.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-08742

Application Number: 01-08742
APS Premise Number: 0125043030
Permit Fee: **To be entered upon final issuance**
Name of Facility: Amtekco Industries Inc
Person to Contact: Ron Fishking
Address: 1675 South High Street
Columbus, OH 43207

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

**1675 South High Street
Columbus, Ohio**

Description of proposed emissions unit(s):

Pre lamination process.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

- 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

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	9.6
OC	68.3
Single HAP	9.9*
Combined HAPs	24.9*

*facility wide
emissions

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Woodworking operations vented to a baghouse	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the bag house stack shall not exceed 2.2 pounds per hour and 9.6 tons per year. See sections A.2.a, A2.b and B.1, below.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B)(1).
	OAC rule 3745-17-11(B)(1)	Visible PE from the bag house stack shall not exceed 20%, as a 6- minute average, except as provided by rule.
		The PE limitation established pursuant to OAC rule 3745-31-05 above is more stringent than the emission limitation established by this rule.

2. Additional Terms and Conditions

- 2.a The 2.2 lbs PE/hr and 9.6 tons PE/yr limitations for this emissions unit were established to reflect the maximum potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The permittee shall operate and maintain the sawdust collection system and vent emissions to the baghouse according to manufactures specifications to maximize capture

Amtekco Industries Inc
PTI A
Issued

Facility ID: 0125043030

Emissions Unit ID: **P001**

efficiency and control capabilities.

Amtel

PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 3.5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operates and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drop across the bag house on a daily basis.

D. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all time periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
PE from the bag house stack shall not exceed 2.2 lbs/hr.

Applicable Compliance Method:

The hourly PE emission rate may be determined by calculation at an air flow rate of 12,700 acfm multiplied by an outlet loading of 0.02 grains/dscf multiplied by 1 lb/7,000 grains multiplied by 60 minutes/1hour equals 2.2 lbs/hr.

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 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10)

- b. Emission Limitation:
PE shall not exceed 9.6 tons/yr.

Applicable Compliance Method:

Amtel

PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

The annual limitation was established by multiplying the hourly emission limitation by the maximum possible annual operating hours (8,760 hrs/yr) and dividing by 2000 lbs/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly emission limitation.

- c. Emission Limitation:
Visible PE from the baghouse stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

Amtel

PTI A

Emissions Unit ID: R001

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Contact adhesive spray application for pre-laminate	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 6.3 lbs/hr, excluding cleanup materials, and 27.9 tons during any rolling, 12-month period, including cleanup materials. See sections A.2.a and A.2.b below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) , 3745-31-05(D) and 3745-35-07(B).
	OAC rule 3745-31-05(D)	See sections A.2.b below.
	OAC rule 3745-35-07(B)	See section A.2.c below.

2. Additional Terms and Conditions

- 2.a The short term limitation of 6.3 lbs OC per hour was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup

Emissions Unit ID: **R001**

materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.c** The facility-wide individual and combined hazardous air pollutant (HAP)¹ emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total facility OC emissions to less than 68.3 tons during any rolling, 12-month period.

The permittee has existing HAP and VOC emissions records such that the permittee does not need to be restricted during the first year after permit is issued final on a monthly basis.

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. For purposes of limiting facility wide OC potential to emit emissions using daily records, the permittee shall collect and record the following information for each day during which adhesives are applied to pre-laminate (R001):
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon; and
 - d. the total OC emission rate for all coatings and cleanup material, in pounds per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule

Amtel

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

3745-21-01(C)(5).]

- 2.. The permittee shall collect and record the following information during each month for the purpose of determining annual OC emissions and limiting facility wide OC potential to emit emissions:
 - a. the company identification for each cleanup material employed and whether or not the material is a photochemically reactive material;
 - b. the number of gallons of each cleanup material employed in each booth;
 - c. the OC content of each cleanup material, in pounds per gallon;

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- d. the total OC emissions for all cleanup materials, in pounds;
 - e. the total OC emission rate for all coating, in pounds, by summing the daily emissions from C.1.d above; and
 - f. the monthly OC emission rate for all coatings and cleanup materials, in pounds (i.e., the sum of the figures from items (d) and (e)).
3. The permittee shall collect and record the following information for all emissions units at this facility during each month:
- a. the name and identification number for each coating material employed during the monthly period;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating employed;
 - c. the total combined HAP content of each HAP of each coating in pounds of combined HAPs per gallon of coating employed (sum of all the individual HAP contents from b);
 - d. a summation of the number of gallons of each coating material employed during the previous rolling, 12-month period;
 - e. the name and identification number for each clean up material employed;
 - f. the individual HAP¹ content for each HAP of each clean up material in pounds of individual HAP per gallon of clean up material employed;
 - g. the total combined HAP content of each HAP of each clean up material in pounds of combined HAPs per gallon of clean up material employed (sum of all the individual HAP contents from f);
 - h. a summation of the number of gallons of each clean up material employed during the previous rolling, 12-month period;
 - i. the total individual HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of b time d for each coating and the sum of f times h for each clean up material);

Emissions Unit ID: **R001**

- j. the total combined HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of c time d for each coating and the sum of g times h for each clean up material); and
- k. the summation of the rolling, 12-month OC emission rates for all coatings and clean up materials employed, in tons.

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

- 4. The permit to install for this emissions unit in this permit 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: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.72
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 325
MAGLC (ug/m3): 4,476

Pollutant: hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.72
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 325
MAGLC (ug/m3): 4,190

Pollutant: heptane
TLV (mg/m3): 1,640
Maximum Hourly Emission Rate (lbs/hr): 1.44
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 650
MAGLC (ug/m3): 39,048

Amtel

PTI A

Emissions Unit ID: **R001**

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Pollutant: acetone

TLV (mg/m³): 1,188

Maximum Hourly Emission Rate (lbs/hr): 2.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,300

MAGLC (ug/m³): 28,286

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.

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.

D. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports for the following:

- a. an identification of each day during which photochemically reactive coatings and photochemically reactive cleanup materials were employed, and the actual OC emissions for each such day;
- b. exceedance of the rolling, 12 -month total individual HAP emissions limitation, as specified in section A.2.c above;
- c. exceedance of the rolling, 12 -month total combined HAP emissions limitation, as specified in section A.2.c above; and
- d. all exceedances of the rolling, 12 -month OC emissions limitation, as specified in section A.2.c above.

Each quarterly report shall include the date of each exceedance, the type of exceedance and the resultant increase, as well as any corrective actions that were taken to return to compliance.

2. The permittee shall submit annual reports to the Ohio EPA, CDO which summarizes the individual HAP, total HAPs and OC emitted from the facility. This annual report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report..

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
OC emissions shall not exceed 6.3 lbs/hr.

Amtel

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon calculation at maximum solvent content of 4.87 lbs OC/gallon of coating multiplied by the maximum hourly coating application rate of 1.3 gallons equals 6.3 lbs OC/hr.

- b. Emission Limitation:
OC emissions from this emissions unit shall not exceed 27.9 tons during any rolling, 12-month period.

Applicable Compliance Method:

The permittee shall ensure compliance with the above limit based upon the record keeping requirements in section C above.

- c. Emission Limitations:
The emissions of HAPs, as defined in Section 112(b) of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs, during any rolling, 12-month period.
Applicable Compliance Method:
The permittee shall ensure compliance based upon the record keeping requirements in section C.3 above.

- d. Emission Limitations:
The emissions of OC from all emissions units at this facility shall not exceed 68.3 tons during any rolling, 12-month period.

Applicable Compliance Method:

The permittee shall ensure compliance with the above limit based upon the record keeping requirements in section C.2 above.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Spray booth 1 with dry filtration system and oven	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.25 lbs/hr, excluding cleanup materials, and 20.2 tons during any rolling, 12-month period, including cleanup materials.
		See section A.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-31-05(D) and 3745-35-07(B).
	OAC rule 3745-31-05(D)	OC emissions shall not exceed 40 lbs/day, on any day during which photochemically reactive materials are employed in this emissions unit.
	OAC rule 3745-35-07(B)	See section A.2.e below.
		See section A.2.e below.

2. Additional Terms and Conditions

- 2.a The short term limitation of 2.25 lbs OC per hour was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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- 2.b** This emissions unit does not currently employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This emissions unit is exempt from the emission limitations/control requirements specified in OAC rule 3745-21-07(G)(2) on any day during which only non-photochemically reactive materials are employed.
- 2.c** On any day during which photochemically reactive materials are employed in this emissions unit, the OC emissions shall not exceed 40 lbs/day.
- 2.d** Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.
- 2.e** The facility wide individual and combined HAP¹ emissions shall not exceed 9.9 tons and 24.9 tons during any rolling, 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total facility OC emissions to less than 68.3 tons during any rolling, 12- month period.

The permittee has existing HAP and VOC emissions records such that the permittee does not need to be restricted during the first year after permit is issued final on a monthly basis.

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

B. Operational Restrictions

- 1. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.
- 2. The permittee shall maintain a minimum stack height of 16 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of limiting facility wide OC potential to emit emissions using daily records, the permittee shall collect and record the following information for each day during which coatings are applied in booth 1 (R002):
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;

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- c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon; and
- d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup material, in pounds per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

- 2.. The permittee shall collect and record the following information during each month for the purpose of determining annual OC emissions and limiting facility wide OC potential to emit emissions:
 - a. the company identification for each cleanup material employed and whether or not the material is a photochemically reactive material;
 - b. the number of gallons of each cleanup material employed in each booth;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the total OC emissions for all cleanup materials, in pounds;
 - e. the total OC emission rate for all coating, in pounds, by summing the daily emissions from C.1.d above; and
 - f. the monthly OC emission rate for all coatings and cleanup materials, in pounds (i.e., the sum of the figures from items (d) and (e)).
- 3. The permittee shall collect and record the following information for all emissions units at this facility each month:
 - a. the name and identification number for each coating material employed;
 - b. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating employed;
 - c. the total combined HAP content of each HAP of each coating in pounds of combined

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HAPs per gallon of coating employed (sum of all the individual HAP contents from b);

- d. the number of gallons a summation of the number of gallons of each coating material employed during the previous rolling, 12-month period;
- e. the name and identification number for each clean up material employed;
- f. the individual HAP content for each HAP of each clean up material in pounds of individual HAP per gallon of clean up material employed;
- g. the total combined HAP content of each HAP of each clean up material in pounds of combined HAPs per gallon of clean up material employed (sum of all the individual HAP contents from f);
- h. a summation of the number of gallons of each clean up material employed during the previous rolling, 12-month period;
- i. the total individual HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of b time d for each coating and the sum of f times h for each clean up material);
- j. the total combined HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of c time d for each coating and the sum of g times h for each clean up material); and
- k. the summation of the rolling, 12-month OC emission rates for all coatings and clean up materials employed, in tons.

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

- 4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 5. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

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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: toluene
TLV (mg/m³): 188

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Maximum Hourly Emission Rate (lbs/hr): 0.55

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,037

MAGLC (ug/m3): 4,476

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 0.91

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,728

MAGLC (ug/m3): 14,048

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,840

MAGLC (ug/m3): 10,333

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.

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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.

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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.

D. Reporting Requirements

- 1. The permittee shall notify CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
- 2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports for the following:
 - a. an identification of each day during which the OC emissions from the photochemically reactive coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - b. an exceedance of the rolling, 12-month total individual HAP emissions limitation, as specified in section A.2.e above;
 - c. an exceedance of the rolling, 12 -month total combined HAP emissions limitation, as specified in section A.2.e above; and
 - d. all exceedances of the rolling, 12 -month OC emissions limitation, as specified in section A.2.e above.

Each quarterly report shall include the date of each exceedance, the type of exceedance and the resultant increase in organic compound emissions, as well as any corrective actions that were taken to return to compliance.

- 3. The permittee shall submit annual reports to the Ohio EPA, CDO which summarizes the

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individual HAP, total HAPs and OC emitted from the facility. This annual report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report..

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E. Testing Requirements

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

- a. Emissions Limitation:
OC emissions shall not exceed 2.25 lbs/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon calculation at maximum solvent content of 5.62 lbs OC/gallon of coating multiplied by the maximum hourly coating application rate of 0.4 gallons equals 2.25 lbs OC/hr.

- b. Emissions Limitation:
OC emissions 40 pounds per day for all coatings and cleanup materials, on any day in which photochemically reactive materials are employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon record keeping requirements in section C.1.

- c. Emission Limitation:
OC emissions shall not exceed 20.2 tons during any rolling, 12-month period, including cleanup solvent usage.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon record keeping requirements in section C.

- d. Emission Limitation:
The emissions of HAPs, as defined in Section 112(b) of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs during any rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.3.

- e. Emission Limitation:
The emissions of OC from all emissions units at this facility shall not exceed 68.3 tons,

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during any rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.3.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Spray booth 2 with dry filtration and oven	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.25 lbs/hr, excluding cleanup materials, and 20.2 tons OC during any rolling, 12-month period, including cleanup materials. See section A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-31-05(D), and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 40 pounds per day for all coatings and cleanup materials, on any day in which photochemically reactive materials are employed.
	OAC rule 3745-35-07(B)	See section A.2.e below.
	OAC rule 3745-31-05(D)	See section A.2.e below.

2. Additional Terms and Conditions

- 2.a The short term limitation of 2.25 lbs OC per hour was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this

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limit.

- 2.b** This emissions unit does not currently employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This emissions unit is exempt from the emission limitations/control requirements specified in OAC rule 3745-21-07(G)(2) on any day during which only non-photochemically reactive materials are employed.
- 2.c** On any day during which photochemically reactive materials are employed in this emissions unit, the OC emissions shall not exceed 40 lbs/day.
- 2.d** Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.
- 2.e** The facility-wide individual and combined hazardous air pollutant (HAP)¹ emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total facility OC emissions to less than 68.3 tons per rolling, 12- month period.

The permittee has existing HAP and VOC emissions records such that the permittee does not need to be restricted during the first year after permit is issued final on a monthly basis.

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

B. Operational Restrictions

1. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 16 feet above ground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

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C. Monitoring and/or Recordkeeping Requirements

1. For purposes of limiting facility wide OC potential to emit emissions using daily records, the permittee shall collect and record the following information for each day during which coatings are applied in booth 2 (R003):
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;

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- c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon; and
- d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup material , in pounds per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information during each month for the purpose of determining annual OC emissions and limiting facility wide OC potential to emit emissions:
 - a. the company identification for each cleanup material employed and whether or not the material is a photochemically reactive material;
 - b. the number of gallons of each cleanup material employed in each booth;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the total OC emissions for all cleanup materials, in pounds;
 - e. the total OC emission rate for all coating, in pounds, by summing the daily emissions from C.1.d above; and
 - f. the monthly OC emission rate for all coatings and cleanup materials, in pounds (i.e., the sum of the figures from items (d) and (e)).
- 3. The permittee shall collect and record the following information for all emissions units at this facility each month:
 - a. the name and identification number for each coating material employed;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating employed;
 - c. the total combined HAP content of each HAP of each coating in pounds of combined HAPs per gallon of coating employed (sum of all the individual HAP contents from b);

- d. the number of gallons a summation of the number of gallons of each coating material employed during the previous rolling, 12-month period;
- e. the name and identification number for each clean up material employed;
- f. the individual HAP content for each HAP of each clean up material in pounds of individual HAP per gallon of clean up material employed;
- g. the total combined HAP content of each HAP of each clean up material in pounds of combined HAPs per gallon of clean up material employed (sum of all the individual HAP contents from f);
- h. the number of gallons a summation of the number of gallons of each clean up material employed during the previous rolling, 12-month period;
- i. the total individual HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of b time d for each coating and the sum of f times h for each clean up material);
- j. the total combined HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of c time d for each coating and the sum of g times h for each clean up material); and
- k. the summation of the rolling, 12-month OC emission rates for all coatings and clean up.

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

- 4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 5. The permit to install for these emissions units in this permit 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

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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: toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 0.55

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,037
MAGLC (ug/m3): 4,476

Pollutant: methyl ethyl ketone
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.91
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,728
MAGLC (ug/m3): 14,048

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 2.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,840
MAGLC (ug/m3): 10,333

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

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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 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.

D. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports for the following:
 - a. identification of each day during which the organic compound emissions from the photochemically reactive coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - b. an exceedance of the rolling, 12-month total individual HAP emissions limitation, as specified in section A.2.e above;
 - c. an exceedance of the rolling, 12 -month total combined HAP emissions limitation, as specified in section A.2.e above; and
 - d. all exceedances of the rolling, 12 -month OC emissions limitation, as specified in section A.2.e above.

Each quarterly report shall include the date of each exceedance, the type of exceedance and the resultant increase in organic compound emissions, as well as any corrective actions that were taken to return to compliance.

2. The permittee shall notify the Ohio EPA, CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDO within 30 days after the event

occurs.

3. The permittee shall submit annual reports to the Ohio EPA, CDO which summarizes the individual HAP, total HAPs and OC emitted from the facility. This annual report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report..

E. Testing Requirements

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

- a. Emissions Limitation:
OC emissions shall not exceed 2.25 lbs/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon calculation at maximum solvent content of 5.62 lbs OC/gallon of coating multiplied by the maximum hourly coating application rate of 0.4 gallons equals 2.25 lbs OC/hr.

- b. Emissions Limitation:
OC emissions 40 pounds per day for all coatings and cleanup materials, on any day in which photochemically reactive materials are employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon record keeping requirements in section C.1.

- c. Emission Limitation:
OC emissions shall not exceed 20.2 tons during any rolling, 12-month period, including cleanup solvent usage.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.

- d. Emission Limitation:
The emissions of HAPs, as defined in Section 112(b) of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 tons per year for an individual HAP and

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24.9 tons per year for any combination of HAPs, during any rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.3.

e. Emission Limitations:

The facility-wide emissions of OC shall not exceed 68.3 tons during any rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.3.

F. Miscellaneous Requirements

None