



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08908

Fac ID: 0125043070

DATE: 11/2/2004

QPI

Tony Troiano
2222 South 3rd Street
Columbus, OH 43207

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

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

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

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

Sincerely,

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

cc: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 11/2/2004
Effective Date: 11/2/2004**

FINAL PERMIT TO INSTALL 01-08908

Application Number: 01-08908
Facility ID: 0125043070
Permit Fee: **\$300**
Name of Facility: QPI
Person to Contact: Tony Troiano
Address: 2222 South 3rd Street
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2222 South 3rd Street
Columbus, Ohio**

Description of proposed emissions unit(s):
Sandblaster and spray booth.

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

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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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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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

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

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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>
OC	1.7
PE	0.7

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>	OAC rule 3745-17-07(A)(1)
K001 - Brewco Spray Paint booth for miscellaneous metal parts vented to dry filtration system	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-09(U)(2)(e)(iii)	
	OAC rule 3745-17-11(B)(2)	

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Emissions Unit ID: **K001**

Applicable Emissions
Limitations/Control
Measures

Volatile organic compound (VOC) emissions shall not exceed 48.6 lbs/day and 1.7 ton/yr.

See sections B.1-3, below.

The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).

The permittee shall not employ more than 10 gallons of coating per day for miscellaneous metal parts coating.

The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/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 I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section A.2.a below.

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Emissions Unit ID: **K001**

2. Additional Terms and Conditions

- 2.a** This emissions unit will be operated and maintained in accordance with the 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.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 500 gallons at 4.86 lbs VOC/gallon.
2. The maximum annual solvent usage for this emissions unit shall not exceed 125 gallons at 7.1 lbs VOC/gallon.
3. The permittee shall operate the dry filtration system, whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day in which coatings were applied, for the purposes of determining the monthly VOC emission rate:
 - a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating employed during the day; and
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions:
 - a. a summation of the number of gallons of coating employed during the month from C.1.b
 - b. the name and number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the VOC content of each coating, as applied, in pounds per gallon; and
 - e. the total VOC emissions from all coatings and cleanup materials employed, in

pounds or tons.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Central District Office (CDO) in writing of the following:

- a. any daily record showing that the dry filtration system was not in service when the emissions unit was in operation; and
- b. any daily record showing the use of more than 10 gallons of coating per day.

The notification shall include a copy of such record and shall be sent to the CDO within 30 days after the event occurs.

2. The permittee shall submit annual reports which specify the VOC emissions from this emissions unit for the previous calendar year. The 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 Fee Emission Report.

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. Emissions Limitation:
VOC emissions shall not exceed 48.6 lbs/day.

Applicable Compliance Method:

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

$$(4.86 \text{ lbs VOC (coating)/gallon} * 10 \text{ gallons/day}) = 48.6 \text{ lbs VOC/day}$$

- b. Emission Limitation:
VOC emissions shall not exceed 1.7 tons/yr, including cleanup.

Applicable Compliance Method:

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Emissions Unit ID: **K001**

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

125 gallon cleanup solvent/yr * 7.2 lbs VOC/gallon * 1 ton/2000 lb = 0.45 ton VOC/yr

500 gallon coating * 4.86 lbs VOC/gallon * 1 ton/2000 lbs = 1.21 ton VOC/yr

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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 - Clemco Model 1648 sandblast booth vented to a dust collector	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.15 lb/hr and 0.7 ton/yr.
		See A.2.a below.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 374-31-05 (A)(3).
	OAC rule 3745-17-11 (B)(1)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 374-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall eliminate visible PE through the employment of BAT, in accordance with the PTI application. These measures shall include, but not be limited to, the following:
 - i. the use of a booth to enclose the sandblast to achieve a 100% capture efficiency; and
 - ii. the venting of captured PE to a dust collector that achieves a 98% control efficiency with no visible emissions from the dust collector stack.

- 2.b** The 0.15 lb PE/hr and 0.7 ton PE/yr limitations were established for PTI purposes to reflect the potential to emit for this emissions unit after control. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. The pressure drop across the dust collector controlling captured emissions shall be maintained within the range specified by the manufacturer while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the following on a daily basis:
 - a. the pressure drop across the baghouse for each day when the emission unit operates; and
 - b. a log or record of the downtime for the control device and monitoring equipment, when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(1).

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
PE shall not exceed 0.15 lb/hr.

Applicable Compliance Method:
If required, compliance may be demonstrated by calculation using an emission factor of 27 lbs PE/1000 lb sand (AP42, Table 13.2.6-1) multiplied times a maximum sand usage of 264 lbs of sand/hr multiplied times (1 - 0.98) for control efficiency equals 0.14 lb PE/hr.
 - b. Emissions Limitation:
PE shall not exceed 0.7 ton/yr.

Applicable Compliance Method:

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

c. Emission Limitation:

The permittee shall eliminate visible PE through the employment of an enclosure with venting to a dust collector, in accordance with the PTI application.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

F. Miscellaneous Requirements

None