



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
KNOX COUNTY**

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: 01-08303

DATE: 4/17/2001

Power and Control Systems
Michael Martin
10 Pittsburgh Ave
Mt Vernon, OH 43050

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 01-08303

Application Number: 01-08303
APS Premise Number: 0142010075
Permit Fee: **\$200**
Name of Facility: Power and Control Systems
Person to Contact: Michael Martin
Address: 10 Pittsburgh Ave
Mt Vernon, OH 43050

Location of proposed air contaminant source(s) [emissions unit(s)]:
10 Pittsburgh Ave
Mt Vernon, Ohio

Description of proposed emissions unit(s):
1 Booth (1 spray can each) airless system.

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 Related to Monitoring and Recordkeeping 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 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 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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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>
VOC/OC	1.70

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>
K003 - K003-Paint Booth No. 3, coating rolled steel, indoor and outdoor electrical switch & breaker gears (buildings/structures)	OAC rule 3745-31-05(A)(3)	Total OC emissions shall not exceed 5.44 lbs/hr and 1.70 tons/year.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of any coating employed in K003 shall not exceed 3.5 pounds of VOC/gallon of coating, excluding water and exempt solvents, for an extreme performance coatings.
	OAC rule 3745-21-07(G)	Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9) when coating insulation or other non-metal materials. See Section A.2.a.

2. Additional Terms and Conditions

- 2.a This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9) when coating non-metal.

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

2. The permittee shall not apply more than 4 batches of coating in any single hour, and no single batch shall contain more than 96 ounces of coating.
3. If the permittee adds any coating exceeding 2.0 pounds of VOC per gallon to a batch, the number of batches applied during that hour shall not exceed 3, unless the VOC content exceeds 2.66 pounds of VOC per gallon in which the number of batches shall not exceed 2 batches during that hour.
4. If the permittee wishes to make any adjustments or modifications to the restrictions described in Sections B.2 and B.3 above, while still maintaining compliance with the hourly OC limit (e.g. a change in the ounces of coating per batch), the permittee must first notify the Ohio EPA Central District Office of this modification, in writing; and recordkeeping of the modified calculations for OC emissions shall also be required, to demonstrate continued compliance with the hourly OC limit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of the company identification for each coating, purge, and cleanup material employed, their chemical composition, and documentation to show each to be either photochemically reactive or nonphotochemically reactive.
2. The permittee shall collect and record the following information each day for the coating operations, and records shall be maintained by batch of coating applications:
 - a. the name and identification number of each coating, as applied, and cleanup material, excluding water;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the total VOC emissions from all coatings and cleanup materials employed, summed for each batch run during the day, in pounds; and
 - f. if the VOC content of any coating added to a batch exceeds 2.0 lbs VOC/gallon, a record of the number of batches run during any such hour, and the average hourly VOC emission

rate, calculated and summed for each batch run during each such hour of operation.

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 in writing of any daily record showing the use of noncomplying coatings, exceeding 3.5 pounds of VOC per gallon. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify any record showing the application of a photochemically reactive material to insulation or non-metal materials in this emission unit. These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.
3. The permittee shall notify the Ohio EPA Central District Office 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.
4. The permittee shall submit deviation reports which identify any record of an exceedance of the hourly or annual emission limitation. These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.
5. The permittee shall submit deviation reports which identify any record of the application of more than 4 batches of coating in any single hour, and/or record of any single batch containing more than 96 ounces of coating, unless a modification has been requested as required in Section B.4. These deviation reports shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.
6. The permittee shall submit deviation reports which identify any record of the application of more than 3 batches in any hour, when applying any coating exceeding 2.0 pounds of VOC per gallon, and/or any record of the application of more than 2 batches in any hour, when applying any coating exceeding 2.66 pounds of VOC per gallon. These deviation reports shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

E. Testing Requirements

1. Emission Limitation:

5.44 pounds VOC per hour

Applicable Compliance Method

Compliance with the hourly emission limit shall be determined through daily recordkeeping of the coating and cleanup material usage, the organic compound content of each material used, and the summation of the calculated VOC emissions from each of the materials applied. Formulation data from the manufacturer or US EPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials to be used in the calculation of emissions. Potential hourly emissions shall be calculated by multiplying the highest VOC content of the coating and/or cleanup materials used (lbs VOC/gallon of material) times any materials' maximum usage in any hour (gallons/hr). Maximum hourly emissions may be documented in the following worst case calculation of emissions as follows:

$$\text{VOC emissions/hr} = (\text{maximum lbs VOC/gal of coating}) \times (\text{maximum batches/hr}) \times (\text{maximum coating/batch}) \times (1/\text{minimum coating density})$$
$$\text{VOC emissions/hr} = (2.0 \text{ lbs VOC/gal}) \times (4 \text{ batches/hr}) \times (96 \text{ oz coating/batch}) \times (1 \text{ lb}/16 \text{ oz}) \times (1 \text{ gal}/8.82 \text{ lbs}) = 5.44 \text{ lbs VOC/hr}$$

If any coating with a VOC content greater than 2.0 lbs VOC/gal is added to any batch, the average hourly emissions calculations shall be performed for each such hour, to demonstrate compliance with this limit.

2. Emission Limitation

1.70 tons VOC per year

Applicable Compliance Method

Compliance with the annual VOC limit shall be determined through daily recordkeeping, by batch, of each coating and cleanup material's usage; the organic compound content of each coating and cleanup material, and the daily calculated emissions. The total annual VOC emissions shall be summed at the end of each year. Formulation data from the coating manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the coating and cleanup materials, to be used in the calculation of emissions.

3. Emission Limitation

3.5 pounds of VOC/gallon, excluding water and exempt solvents, for an extreme performance coating

Applicable Compliance Method

Compliance with this VOC limit shall be determined through daily recordkeeping of the organic compound content of each coating used. Formulation data from the coating manufacturer or US EPA Method 24 shall be used to determine the organic compound content of the coatings.

F. Miscellaneous Requirements

Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 01-08303 Facility ID: 0142010075

FACILITY NAME Power and Control Systems

FACILITY DESCRIPTION 1 Booth (1 spray can each) airless system. CITY/TWP Mt Vernon

SIC CODE 3644 SCC CODE 4-02-006-10 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION K003-Paint Booth No. 3, coating rolled steel, indoor and outdoor electrical switch & breaker gears (buildings/structures)

DATE INSTALLED with PTI issue

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	5.44	1.70	5.44	1.70
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No, less than 1 ton/year toxics, only 1.70 TPY OCs

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 01-08303

Facility ID: 0142010075

FACILITY NAME Power and Control Systems

FACILITY DESCRIPTION 1 Booth (1 spray can each) airless system. CITY/TWP Mt Vernon

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Other information regarding this permit:

The facility only uses non-PRM and < 3.0 lbs VOC/gal for all coatings, however, they would like the option to use the limits and allowed PRM on metal, from the applicable rules. None of the coatings contain the exempt solvents found in 3745-21-01(B)(6). If a new coating were to contain any of these exempt solvents, the facility would not have the ability to reduce/adjust the usage records by the amount of the exempt solvent in a single coating; records of emissions will only be more conservative by excluding this from the library term. The recordkeeping terms were modified to meet the facility needs, to show compliance with their batch system, using compliance coatings. The facility makes all coating applications by batch, as shown in the testing section, and they requested that we maintain the daily recordkeeping in this format.

99% of their business is coating the metal electrical houses (called gears), very few require insulation to be coated and 21-07 is applicable to only a very small part of their activities. All of their coatings are non-PRM at this time.

This facility has replaced all of their paints with very low VOC coatings of less than 2.0 lbs VOC/gal. They have only requested 5.44 lbs of VOC/hr and 1.70 tons of VOC/year for this coating booth. However, they wish to retain the option to use a higher VOC content, extreme performance, coating for these outdoor breaker gears and wish to reduce the batches per hour to meet the hourly VOC limit contained in this permit when/if using such a coating.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

NEW SOURCE REVIEW FORM B

PTI Number: 01-08303

Facility ID: 0142010075

FACILITY NAME Power and Control Systems

FACILITY DESCRIPTION 1 Booth (1 spray can each) airless system. CITY/TWP Mt Vernon

B. Facility Emissions and Attainment Status**C. Source Emissions****D. Conclusion****PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

NONE

Please complete:

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
VOC/OC	1.70

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