



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

8/16/2010

NICHOLAS DORONY  
KILROY STRUCTURAL STEEL CO  
8500 UNION AVE  
CLEVELAND, OH 44105

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1318000404  
Permit Number: P0105837  
Permit Type: Administrative Modification  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
CDAQ; Pennsylvania; Canada



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
KILROY STRUCTURAL STEEL CO

Issue Date: 8/16/2010

Permit Number: P0105837

Permit Type: Administrative Modification

Permit Description: Administrative modification to PTI 13-04412, issued final 12/26/2006. The facility has requested the modified permit not include K003 because it was never installed and the facility will not be installing the EU in the future. The facility has also requested that the operational restriction in Part II.B.2. of PTI 13-04412 be modified to remove the requirement. The facility has submitted air toxics modeling for K001 and K002 that demonstrates they are below the MAGLC. Also, it has been determined that it is not feasible for the facility to keep the doors closed because of the volume of product moving in and out.

Facility ID: 1318000404

Facility Location: KILROY STRUCTURAL STEEL CO  
8500 UNION AVE,  
Cleveland, OH 44105

Facility Description: Fabricated Structural Metal Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
KILROY STRUCTURAL STEEL CO**

Facility ID: 1318000404  
Permit Number: P0105837  
Permit Type: Administrative Modification  
Issued: 8/16/2010  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
KILROY STRUCTURAL STEEL CO

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## Authorization

Facility ID: 1318000404

Application Number(s): M0000677

Permit Number: P0105837

Permit Description: Administrative modification to PTI 13-04412, issued final 12/26/2006. The facility has requested the modified permit not include K003 because it was never installed and the facility will not be installing the EU in the future. The facility has also requested that the operational restriction in Part II.B.2. of PTI 13-04412 be modified to remove the requirement. The facility has submitted air toxics modeling for K001 and K002 that demonstrates they are below the MAGLC. Also, it has been determined that it is not feasible for the facility to keep the doors closed because of the volume of product moving in and out.

Permit Type: Administrative Modification

Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/16/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

KILROY STRUCTURAL STEEL CO  
8500 UNION AVE  
Cleveland, OH 44105

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

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

Cleveland Division of Air Quality  
2nd Floor  
75 Erievue Plaza  
Cleveland, OH 44114  
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0105837

Permit Description: Administrative modification to PTI 13-04412, issued final 12/26/2006. The facility has requested the modified permit not include K003 because it was never installed and the facility will not be installing the EU in the future. The facility has also requested that the operational restriction in Part II.B.2. of PTI 13-04412 be modified to remove the requirement. The facility has submitted air toxics modeling for K001 and K002 that demonstrates they are below the MAGLC. Also, it has been determined that it is not feasible for the facility to keep the doors closed because of the volume of product moving in and out.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	K001
Superseded Permit Number:	13-04412
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	K002
Superseded Permit Number:	13-04412
General Permit Category and Type:	Not Applicable



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



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

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

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

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

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

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

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

while the emissions unit was in operation, for at least five years from the date the record was generated.

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

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

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

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

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

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

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

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

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

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



1. Emissions Unit Group - Airless Spray Guns: K001, K002,

EU ID	Operations, Property and/or Equipment Description
K001	Steel coating operation using an airless spray gun
K002	Steel coating operation using an airless spray gun

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(5), d)(6), and d)(7)
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c., d)(4), e)(4), f)(1)e., f)(1)f.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  Administrative Modification for PTI 13-04412 Modification issued 12-26-06.	<p>Volatile Organic Compound (VOC) emissions from coatings shall not exceed 10.50 pounds per hour and 45.99 tons per year per emissions unit.</p> <p>VOC emissions from cleanup materials shall not exceed 0.45 ton per year per emissions unit.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).</p>
b.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coating shall not exceed 3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents.
c.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V, and	See Additional Terms and Conditions b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	MACT Subpart M MMM	

(2) Additional Terms and Conditions

a. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 and K002 shall not exceed 9.9 tons/year for any individual HAP or 24.9 tons/year for a combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation of emissions for this emissions unit plus the annual HAP contribution from all other emissions units at this facility (K001 and K002).

c) Operational Restrictions

(1) The permittee shall operate roof vents 1 and 2 in this emissions unit's coating area, at all times while conducting painting activities.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when roof vents 1 and 2 were not operating in this emissions unit's coating area, while painting activities were conducted.

(2) The permittee shall collect and record the following information each day for this emissions unit:

- a. the name and identification number of each coating employed and cleanup material dispensed;
- b. the amount, in gallons, of each coating employed;
- c. the amount, in gallons, of each cleanup material dispensed;
- d. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
- e. the total VOC emission rate for all coatings, in pounds and tons [summation of (b x d) for all coatings];
- f. hours of operation;
- g. average hourly emission rate, in pounds per hour (e/f);
- h. the amount, in gallons, of cleanup material that is contained for disposal;
- i. the total emission rate for cleanup material [d(c-h)], in pounds and tons; and
- j. the VOC content of each coating, in pounds per gallon less water and exempt solvents, as applied.

- (3) The permittee shall collect and record the total VOC emissions from all coatings and cleanup materials employed for this emissions unit, for the purpose of determining annual VOC emissions (summation of daily emissions from C.1. above divided by 2000 lbs/ton).
- (4) The permittee shall maintain monthly records of the following information for the facility (K001 and K002):
- a. the name and identification number of each HAP containing material employed;
  - b. the individual HAP content for each HAP, in pounds of individual HAP per gallon of material;
  - c. the total combined HAP content, in pounds of combined HAPs per gallon of material [sum all the individual HAP contents from (b)];
  - d. the number of gallons, of each HAP containing material employed;
  - e. the total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
  - f. the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
  - g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI;
  - h. the updated rolling, 12-month summation of usage and emissions for the total combined HAPs, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI; and
  - i. the operating hours for each month.
- \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (Cleveland DAQ) contact. This information does not have to be kept on an individual emission unit basis.
- (5) The permit to install for emissions units K001 and K002 was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust systems, 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 these emissions units 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:

Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434.4

Maximum Hourly Emission Rate (lbs/hr): 16.6 lbs/hr (Total for K001 and K002 combined)

Predicted 1-Hour Maximum Ground-Level

Concentration at the property line (μg/m<sup>3</sup>): 7354.84

MAGLC (μg/m<sup>3</sup>): 10,341.8

Pollutant: MIBK

TLV (mg/m<sup>3</sup>): 204.9

Maximum Hourly Emission Rate (lbs/hr): 10.52 lbs/hr (Total for K001 and K002 combined)

Predicted 1-Hour Maximum Ground-Level

Concentration at the property line (μg/m<sup>3</sup>): 4661.02

MAGLC (μg/m<sup>3</sup>): 4,878.8

Pollutant: Ethyl benzene

TLV (mg/m<sup>3</sup>): 434.4

Maximum Hourly Emission Rate (lbs/hr): 9.62 lbs/hr (Total for K001 and K002 combined)

Predicted 1-Hour Maximum Ground-Level

Concentration at the property line (μg/m<sup>3</sup>): 4262.27

MAGLC (μg/m<sup>3</sup>): 10,341.8

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 75.3

Maximum Hourly Emission Rate (lbs/hr): 2.14 lbs/hr (Total for K001 and K002 combined)

Predicted 1-Hour Maximum Ground-Level

Concentration at the property line (μg/m<sup>3</sup>): 948.15

MAGLC (μg/m<sup>3</sup>): 1793.7

Pollutant: Cumene

TLV (mg/m<sup>3</sup>): 245.8

Maximum Hourly Emission Rate (lbs/hr): 10.52 lbs/hr (Total for K001 and K002 combined)

Predicted 1-Hour Maximum Ground-Level

Concentration at the property line (μg/m<sup>3</sup>): 4641.71

MAGLC (μg/m<sup>3</sup>): 5852.6

- (6) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

e) Reporting Requirements

- (1) The permittee shall include in the Permit Evaluation Report any daily record showing that roof vents 1 and 2 were not operating in this emission unit's coating area, while conducting painting activities.
- (2) In accordance with OAC rule 3745-21-09(B)(3)(g), the permittee shall notify the Cleveland DAQ in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month.
- (3) The permittee shall include in the Permit Evaluation Report each day during which the average hourly VOC emissions from the coating operation exceeded 10.5 lbs/hr.

(4) The permittee shall submit quarterly deviation (excursion) reports for the entire facility (includes emissions units K001 and K002) which include the following information:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

an identification of each month during which the rolling, 12-month individual HAP emissions exceed 9.9 tpy (and combined HAPs emissions exceed 24.9 tpy) based on a rolling, 12-month summation and the actual rolling, 12-month individual (and combined) HAP emissions for each such month;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

(5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:  
VOC emissions shall not exceed 10.50 lbs/hr from coatings.

Applicable Compliance Method:

Compliance with the above daily emission limitation shall be determined by the record keeping as specified in d)(2).

- b. Emission Limitation:  
VOC emissions shall not exceed 45.99 tons per year from coatings.
- Applicable Compliance Method:  
Compliance with yearly emission limitation shall be determined by summing the daily emission rates and dividing by 2000 lbs/ton for each calendar year, as specified in d)(2).
- c. Emission Limitation:  
The VOC content of the coatings shall not exceed 3.50 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- Applicable Compliance Method:  
Compliance with the VOC limitation above shall be determined from the record keeping as specified in d)(2).
- Compliance may also be determined by calculating the VOC content in accordance with the equation specified in OAC Rule 3745-21-10(B)(9) for  $C_{VOC,2}$  for the daily volume-weighted average VOC content.
- USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. The permittee may obtain the Method 24 analysis for each coating from the supplier.
- d. Emission Limitation:  
VOC emissions from cleanup materials shall not exceed 0.45 ton per year.
- Applicable Compliance Method:  
Compliance with the VOC limitation above shall be determined from the record keeping as specified in d)(2).
- Formulation data shall be used to determine VOC content of the cleanup material.
- e. Emission Limitation:  
HAPs from emissions units K001 and K002 shall not exceed 9.9 tons/year for any individual HAP.
- Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in d)(4).
- f. Emission Limitation:  
HAPs from emissions units K001 and K002 shall not exceed 24.9 tons/year for total combined HAPs.
- Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in d)(4).

**Draft Permit-to-Install and Operate**

KILROY STRUCTURAL STEEL CO

**Permit Number:** P0105837

**Facility ID:** 1318000404

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

g) Miscellaneous Requirements

- (1) This permit supercedes PTI 13-04412 Modification issued December 26, 2006. The PTI included emissions unit K003 which never was (nor will be) installed.