



Environmental
Protection Agency

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

9/7/2010

Certified Mail

Alvin Sykes
Whirlpool Corp. Marion Div.
1300 Marion-Agosta Road
Marion, OH 43301-1808

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTA
Facility ID: 0351010012
Permit Number: P0105679
Permit Type: OAC Chapter 3745-31 Modification
County: Marion

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 Marion Star. 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 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 Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,


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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: This permit addresses a modification to emission unit K008, electrocoat dip tank with cure oven, at Whirlpool Corporation-Marion Division in Marion County. The modification includes adjusting the operational restriction of 0.92 lb/gal and increasing it to correct passed violations, in correlation to this change the maximum annual coating usage rate of 168,000 gallons was lowered to accommodate the lb/gal increase. There was also a slight increase in the TPY for VOCs of 0.22 tons.

3. Facility Emissions and Attainment Status: This facility is major for VOC and HAPs for Title V, MACT and PSD purposes. Marion County is in attainment for all criteria pollutants.

4. Source Emissions: Potential VOC emissions: $(68 \text{ gal/hr})(1.25 \text{ lbs VOC/gal})(8760 \text{ hrs/yr})(\text{ton}/2000 \text{ lbs}) = 372.30 \text{ tons VOC/yr}$

The facility has taken restrictions on VOC emissions on annual coating usage of 124,000 gallons.
 $(124,000 \text{ gal/yr})(1.25 \text{ lbs VOC/yr})(\text{ton}/2000\text{lbs})= 77.50 \text{ tons VOC/yr}$

5. Conclusion: The modification is not considered a major modification and the resulting amendments do not trigger the PSD significance level for VOC and therefore, not subject for PSD review.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	77.50

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Whirlpool Corp. Marion Div.

Issue Date: 9/7/2010

Permit Number: P0105679

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: To increase the operational restriction of 0.92 lb/gal to 1.25 lbs/gal due to permittee exceeding the original limit on several occasions. To compensate for the operational increase a reduction of maximum annual gallons used was also initiated. Going from 168,000/yr to 124,000/yr. There was a slight increase in the TPY limit from 77.28 to 77.50. This permit modification will correct any passed violations.

Facility ID: 0351010012

Facility Location: Whirlpool Corp. Marion Div.
1300 Marion-Agosta Road,
Marion, OH 43301-1808

Facility Description: Household Laundry Equipment 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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Whirlpool Corp. Marion Div.**

Facility ID: 0351010012
Permit Number: P0105679
Permit Type: OAC Chapter 3745-31 Modification
Issued: 9/7/2010
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Whirlpool Corp. Marion Div.

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Authorization

Facility ID: 0351010012

Facility Description: Manufacturer of Household Laundry Equipment

Application Number(s): A0038507

Permit Number: P0105679

Permit Description: To increase the operational restriction of 0.92 lb/gal to 1.25 lbs/gal due to permittee exceeding the original limit on several occasions. To compensate for the operational increase a reduction of maximum annual gallons used was also initiated. Going from 168,000/yr to 124,000/yr. There was a slight increase in the TPY limit from 77.28 to 77.50. This permit modification will correct any passed violations.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$100.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/7/2010

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Whirlpool Corp. Marion Div.
1300 Marion-Agosta Road
Marion, OH 43301-1808

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

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

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

The above named entity is hereby granted a Permit-to-Install for the 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 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

Chris Korleski
Director



Authorization (continued)

Permit Number: P0105679

Permit Description: To increase the operational restriction of 0.92 lb/gal to 1.25 lbs/gal due to permittee exceeding the original limit on several occasions. To compensate for the operational increase a reduction of maximum annual gallons used was also initiated. Going from 168,000/yr to 124,000/yr. There was a slight increase in the TPY limit from 77.28 to 77.50. This permit modification will correct any passed violations.

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

Emissions Unit ID:

K008

Company Equipment ID:

Small Parts E-Coat and rinse stages and Cure Oven

Superseded Permit Number:

General Permit Category and Type:

Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



Effective Date: To be entered upon final issuance

- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- 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 state-only required 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 Ohio EPA DAPC, Northwest District Office. 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 (i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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 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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. K008, Small Parts E-Coat and rinse stages and Cure Oven

Operations, Property and/or Equipment Description:

Small parts e-coat line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	85.0 pounds volatile organic compounds (VOC)/hr. See section b)(2)a.
b.	OAC rule 3745-31-05(D)	77.50 tons VOC per rolling, 12-month period. See section b)(2)b.i. and section c)(1)
c.	OAC rule 3745-21-09(K)(1)	2.8 pounds of VOC per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents. See section b)(2)c.
d.	40 CFR, Part 60, Subpart SS	0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids.
e.	40 CFR, Part 63, Subpart NNNN	Organic Hazardous Air Pollutants (HAPs) emissions to the atmosphere must be limited to no more than 0.13 kg/liter (1.1 lbs/gallon) of coating solids used during each compliance period.[40 CFR 63.4090(a)]
f.	40 CFR 63.1-15 (40 CFR 63.4101	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart SS; 40 CFR, Part 63, Subpart NNNN; OAC rule 3745-21-09(K)(1) and OAC rule 3745-31-05(C).
- b. This permit establishes the following federally enforceable emission limitations for the purposes of avoiding applicability of the Prevention of Significant Deterioration (PSD) regulations:
 - i. The VOC emissions shall not exceed 77.50 tons per rolling, 12-month period based on a production restriction (see c)(1)).
- c. The VOC content of the coatings employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 2.8 lbs VOC/gallon of coating, as a daily, volume-weighted average, excluding water and exempt solvents.

On any day when coating materials added to the dip tank exceed 2.8 pounds per gallon minus water and exempt solvents, as a daily volume-weighted average, the permittee shall perform a U.S. EPA Method 24 test to ensure that the resulting coating mixture (as applied) complies with the above limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for this emissions unit shall not exceed 124,000 gallons per year, based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Coating Usage Rate (gallons)</u>
1	10,333
1-2	20,666
1-3	30,999
1-4	41,332



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1-5	51,665
1-6	61,998
1-7	72,331
1-8	82,664
1-9	92,997
1-10	103,330
1-11	113,665
1-12	124,000

After the first 12 calendar months of operation, following issuance of this permit, compliance with the annual coating usage restriction shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- (2) The VOC content of each coating mixture, as applied, shall not exceed 1.25 pounds per gallon.
- (3) See 40 CFR Part 63, Subpart NNNN (40 CFR 63.4080-63.4181).

d) Monitoring and/or Recordkeeping Requirements

- (1) Each month, the permittee shall determine the monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids, in kilograms per liter, calculated as follows:

- a. Calculate the mass of VOC's consumed (Mo+Md) during the calendar month by the following equation:

$$Mo+Md = [\text{summation of } (L_{ci} \times D_{ci} \times W_{oi}) \text{ for } i = 1,2,\dots,n + \text{summation of } (L_{dj} \times D_{dj}) \text{ for } j = 1,2,\dots,m]$$

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

D_{dj} = density of solvent j added to coatings (kilograms per liter)

W_{oi} = the fraction, by weight, of the VOC's in coating i , as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the calendar month

- b. Calculate the total volume of coatings solids used (L_s) in the calendar month by the following equation:

L_s = summation of ($L_{ci} \times V_{si}$) for $i = 1, 2, \dots, n$

where:

L_s = the volume of all the coatings solids consumed (liters)

L_{ci} = the volume of coating i consumed, as received (liters)

V_{si} = the fraction, by volume, of the solids in coating i , as received

n = the number of different coatings used during the calendar month

- c. Calculate the volume-weighted average mass of VOC's consumed per unit volume of coating solids applied during the calendar month by the following equation:

$G = (M_o + M_d) / (L_s \times T)$

where:

G = the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter)

T = transfer efficiency (0.95)

- (2) The permittee shall collect and record the following information each day for the electrocoating dip tank:
- The name and identification number of each material added to the dip tank;
 - The VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank;
 - The number of gallons of each material added to the dip tank, excluding water and exempt solvents;
 - The daily, volume-weighted average VOC content of the combination of materials added to the dip tank, excluding water and exempt solvents, i.e., the sum of (b) x (c)d)(2)b. x d)(2)c. for all the individual materials, divided by the total number of gallons of all materials.

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- (3) On days when the permittee adds coating materials to the small parts e-coat line that do not comply with the daily volume-weighted average of 2.8 pounds VOC per gallon of coating, excluding water and exempt solvents, the permittee shall record the results of the required U.S. EPA Method 24 test (See b)(2)c.).
 - (4) On days when the permittee does not comply with the VOC content restriction of each coating mixture, as applied, of 1.25 pound per gallon, the permittee shall record the results of the required U.S. EPA Method 24 test (See c)(2)).
 - (5) The permittee shall maintain monthly records of the following information for this emission unit:
 - a. The coating usage rate, in gallons;
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;
 - c. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;
 - d. The calculated VOC emissions for each month, in tons, using the following equation:
$$\text{VOC emissions} = (1.25 \text{ lbs VOC/gallon}) \times (\text{A.III.4.ad})(5)\text{a.}) \times (\text{ton}/2000 \text{ lbs}); \text{ and}$$
 - e. Beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month VOC emissions, in tons.
 - (6) See 40 CFR Part 63, Subpart NNNN (40 CFR 63.4080-63.4181).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC emission limitation of 0.90 kg VOC/liter of coating solids (based on a monthly, volume-weighted average).

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeded the applicable limitation of 2.8 pounds VOC/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.
 - (3) The permittee shall submit quarterly reports of all days when a U.S. EPA Method 24 test was required. If no U.S. EPA Method 24 tests were required to be performed during the calendar quarter because the daily volume-weighted average VOC contents of materials added to the coating line were less than 2.8 pounds VOC per gallon coating, excluding water and exempt solvents, a statement indicating that fact will still be required.

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These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions. of this permit.

- (4) The permittee shall submit deviation (excursion) reports which identify the following:
- a. All exceedances of the rolling, 12-month VOC emission limitation of 77.50 tons;
 - b. All exceedances of the rolling, 12-month coatings usage restriction of 124,000 gallons
 - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage restrictions specified in section A.II.1)c)(1); and
 - d. All exceedances of the 1.25 pound per gallon VOC content.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

- (5) See 40 CFR, Part 63, Subpart NNNN (40 CFR 63.4080-63.4181).

f) Testing Requirements

- (1) Compliance with the emission limitations in Section A.Ib)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 85.0 lbs VOC/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was calculated based on multiplying the maximum coating usage rate of 68 gallons per hour by the maximum VOC content of 1.25 pound per gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation: 77.50 tons of OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section A.III.4d(5) of this permit.

- c. Emission Limitation: 2.8 lbs of VOC per gallon of coating, as a daily, volume-weighted average, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping required in section A.III.2d(2) of the terms and conditions of this permit.



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The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

$$\text{daily, volume-weighted average} = [\text{summation of } (G_i \times \text{VOC}_i)] / \text{summation of } G_i \text{ for } i = 1 \text{ to } n$$

where:

$$i = 1, 2, 3, \dots, n$$

n = the total number of the different types of materials added to the dip tank for that day

G_i = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOC_i = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents

- d. Emission Limitation: 0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids.

Applicable Compliance Method: Compliance shall be based upon the record keeping required in section A.III.1d)(1) of the terms and conditions of this permit.

- e. Emission Limitation: Organic HAP emissions to the atmosphere must be limited to no more than 0.13 kg/liter (1.1 lbs/gallon of coating solids used during each compliance period.

Applicable Compliance Method: Compliance shall be based upon the record keeping as required by 40 CFR, Part 63, Subpart NNNN .

- (2) If required, U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings, as applied.

g) Miscellaneous Requirements

- (1) None.