☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **02-20438**

A. Source Description

Col-Pump Company, Inc. is located at 131 East Railroad Street in Columbiana Ohio, Columbiana County. This facility currently qualifies as a Title V facility due to the uncontrolled, potential to emit (PTE) for PM10, carbon monoxide (CO), hazardous air pollutants (HAPs), and volatile organic compounds (VOC). Col-Pump has submitted a FESOP application to NEDO, currently in review, in order to limit the facility's PTEs to below major source thresholds for CO, HAPs, PM 10 and VOC.

Col-Pump Company, Inc. produces gray iron castings, which are coated by this emissions unit K001.

B. Facility Emissions and Attainment Status

Facility emissions are reported in the FESOP application as follows:
Uncontrolled PTE: CO at 4192.26 tpy, HAPs at 32.69 tpy, Lead at 17.34 tpy, NOx at 2.55 tpy, PM10 at 1124.84 tpy, fugitive PM10 at 1.17 tpy, SO2 at 37.58 tpy and VOC at 205.63 tpy.

Facility has submitted a FESOP application to limit emissions to avoid Title V status/requirements and to avoid Iron and Steel Foundry MACT requirements (40 CFR Part 60, Subpart EEEEE).

Columbiana County is currently designated "basic non-attainment" for ozone, according to the 4/19/04 PDF map on the DAPC web page.

C. Source Emissions

K001, the three casting paint dip tanks, coats castings made at the facility. K001 is subject to OAC rule 3745-21-09(U)(1)(d) which limits coating to 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. One dip tank was installed in 1996, and the other two were installed in 2001. These three dip tanks were installed without first obtaining a permit to install. K001 has potential uncontrolled VOC emissions of 210 lbs VOC/day and 38.3 tons VOC/year. The facility proposes to limit coating usage to 9,000 gallons per12-months, rolling summation to restrict VOC emissions to 15.75 tons per rolling 12-months. This is part of the facility wide FESOP strategy.

HAPs are a pollutant of concern for the facility because an existing source (F012) emits HAPs . HAPs are limited by restricted operations of F012 per the requirements of the FESOP. Therefore, HAPs were evaluated for this synthetic minor PTI. Although, there are no HAPs as components in the coatings currently used by the facility, to anticipate any change in coating in the future and to allow flexibility, this PTI will address HAPs only in monitoring and record keeping. Therefore, there are no limits provided for HAPs in this PTI.

D. Conclusion

This permit to install will restrict the VOC emissions from K001 to allow facility emissions to be under Title V and MACT thresholds. Potential HAP emissions are addressed only in monitoring and record keeping to account for any future change in coating where HAPs may

be a component in the coating.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
COLUMBIANA COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 02-20438
Fac ID: 0215010001

DATE: 7/14/2005

Col-Pump Company, Inc.
Dan Rea
131 East Railroad St.
Columbiana, OH 44408

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO** **Eastgate Dev. & Trans. Study** **WV** **PA**

COLUMBIANA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-20438** FOR AN AIR CONTAMINANT SOURCE FOR
Col-Pump Comany, Inc.

On 7/14/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Col-Pump Comany, Inc.**, located at **131 East Railroad St., Columbiana**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-20438:

3 dip tanks.

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

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]

DRAFT PERMIT TO INSTALL 02-20438

Application Number:	02-20438
Facility ID:	0215010001
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Col-Pump Company, Inc.
Person to Contact:	Dan Rea
Address:	131 East Railroad St. Columbiana, OH 44408

Location of proposed air contaminant source(s) [emissions unit(s)]:
131 East Railroad St.
Columbiana, Ohio

Description of proposed emissions unit(s):
3 dip tanks.

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

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. 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 appropriate Ohio EPA District Office or local air agency. 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 B.8 below if no deviations occurred during the quarter.

iii. 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 appropriate Ohio EPA District Office or local air agency 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.

iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit-To-Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete 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 <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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.

2. 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 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 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 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 (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.)

3. 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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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

Pollutant	Tons Per Year
VOC	15.75

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Three casting paint dip tanks	OAC rule 3745-31-05(A)(3)	See Sections A.2.a, b & c below.
	OAC rule 3745-21-09(U)(1)(d)	The limitation specified by this rule is equivalent to the limitation established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B)	See Section A.2.c below.
	40 CFR Part 63, Subpart MMMM	See Section A.2.d below.

2. Additional Terms and Conditions

2.a The volatile organic compound (VOC) content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

2.b VOC emissions shall not exceed 210 pounds per day.

2.c VOC emissions shall not exceed 15.75 tons per rolling, 12-month period.

2.d This emissions unit is not subject to 40 CFR Part 63, Subpart MMMM (MACT for Surface Coating of Miscellaneous Metal Parts). Section 63.3881(c)(1) of this subpart states that this subpart does not apply to a coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to section 63.3941. The Material Safety Data Sheet provided in the application for the coating used in this emissions unit does not include any HAP. If future coatings contain HAP and if the facility is a major source, or is part of a major source of HAP emissions, then this subpart would be applicable per Section 63.3991(b).

II. Operational Restrictions

1. The coating usage shall not exceed 9,000 gallons per rolling, 12-month period.

2. During the first twelve (12) calendar months of operation following the effective date of this permit to install, the cumulative amount of coating used at this emissions unit shall not exceed the cumulative total amount of coating as specified for each month in the following table:

Month	Cumulative Amount of Coating
1	750 gallons
2	1,500 gallons
3	2,250 gallons
4	3,000 gallons
5	3,750 gallons
6	4,500 gallons
7	5,250 gallons
8	6,000 gallons
9	6,750 gallons
10	7,500 gallons
11	8,250 gallons
12	9,000 gallons

3. The permittee shall cover the dip tanks in order to reduce VOC emissions when this emissions unit is not actively in use.

4. The exhaust fan above one dip tank shall operate at 4,000 cubic feet per minute and shall operate at all times when this emissions unit is in operation.

5. The maximum coating usage rate shall not exceed 2.5 gallons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day:

   a. the name and identification number of each coating employed;

   b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating employed;

c. the HAP content, in pounds per gallon, of each coating employed;

d. the volume of each coating employed, in gallons;

e. the VOC emissions, in pounds per day, as calculated by the following equation:

E (lbs VOC/day) = the sum of (A multiplied by B) for each type of coating applied

where;

A = the VOC content, excluding water and exempt solvents, in pounds per gallon
B = volume of coating employed, in gallons per day

f. the HAP emissions, in pounds per day, as calculated by multiplying the HAPs, in pounds per gallon, with the number of gallons employed during the day.

g. the average hourly coating usage, in gallons per hour, calculated by dividing the volume of coatings used during the day by the hours of operating hours of the day.

2. The permittee shall collect and record the following information each month:

a. the total volume of coatings employed, in gallons, during the month;

b. the cumulative total volume of coatings employed, in gallons, during the past 12 rolling months;

c. the VOC emissions, in tons per rolling 12-months, as calculated by the summation of daily VOC emissions during each month, multiplied by ton/2,000 lbs; and

d. the HAP emissions, in tons per rolling 12-months, as calculated by the summation of daily HAP emissions during each month, multiplied by ton/2,000 lbs.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing use of noncomplying coatings, i.e., coatings exceeding 3.5 pounds

VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this emissions unit:

   a. an identification of each day during which the VOC emissions were calculated to exceed 210 pounds per day;

   b. an identification of each day during which the average hourly coating usage rate exceeded 2.5 gallons per hour;

   c. an identification of each day during which VOC content of the coating exceeded 3.5 pounds per gallon;

   d. an identification of each month during which the VOC emissions were calculated to exceed 15.75 tons per rolling, 12-months;

   e. an identification of each month during which the cumulative volume of coatings employed during each month of the first twelve (12) months of operation following issuance of this permit exceeded the stated amounts per Section B.2;

   f. an identification of each month after the first twelve (12) months of operation following issuance of this permit, during which the cumulative volume of coatings employed during the past rolling 12-months exceeded 9,000 gallons.

   g. an identification of each month during which the HAP emissions were greater than 10 tons per rolling 12-months for any single HAP or greater than 25 tons per rolling 12-months for combined HAPs.

   The calendar quarters are January 1 - March 31, April 1 - June 30, July 1 - September 30, and October 1 - December31. The quarterly deviation reports shall be submitted to the Ohio EPA Northeast District Office quarterly, i,e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

   If no deviations occurred during a calendar quarter, the permittee shall still submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

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

   a. Emission Limitation:
   3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for

coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

b. Emission Limitation:
210 pounds VOC per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.

c. Emission Limitation:
15.75 tons VOC per rolling, 12-months

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Three casting paint dip tanks	Ohio Air Toxics Policy	Ohio Air Toxics Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model . 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: 2-Butoxyethanol
   Maximum Hourly Emission Rate: 3.237 lbs/hr
   TLV: 96,662.58 ug/m^3
   MAGLC = TLV/42: 2,301.5 ug/m^3
   Predicted 1-Hour Maximum Ground-Level Concentration: 1,225.5 ug/m^3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None