



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-20438

Fac ID: 0215010001

DATE: 8/25/2005

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

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

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

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

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

Sincerely,

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/25/2005
Effective Date: 8/25/2005**

FINAL PERMIT TO INSTALL 02-20438

Application Number: 02-20438
Facility ID: 0215010001
Permit Fee: **\$400**
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

Part I - GENERAL TERMS AND CONDITIONS

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

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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.

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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.

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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 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).
- 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.

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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.

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

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).

Col-Pump Company, Inc.
 PTI Application: 02-20438
 Issued: 8/25/2005

Facility ID: 0215010001

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	15.75

Col-Pump Company, Inc.
PTI Application: 02-20438
Issued: 8/25/2005

Facility ID: 0215010001

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Three casting paint dip tanks	OAC rule 3745-31-05(A)(3)	See Sections A.I.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.I.2.c below.
	40 CFR Part 63, Subpart M	See Section A.I.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 M (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:

<u>Month</u>	<u>Cumulative Amount of Coating</u>
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:

$$E \text{ (lbs VOC/day)} = \frac{\text{the sum of (A multiplied by B) for each type of coating}}{\text{applied}}$$

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 II.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 - December 31. 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.I.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 III. 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 III.

- 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 III.

VI. Miscellaneous Requirements

None

Col-P

PTI A

Issued: 8/25/2005

Emissions Unit ID: K001

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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/m³MAGLC = TLV/42: 2,301.5 ug/m³

Emissions Unit ID: K001

Predicted 1-Hour Maximum Ground-Level Concentration: 1,225.5 ug/m³

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.

25

Col-P

PTI A

Issued: 8/25/2005

Emissions Unit ID: K001

IV. Reporting Requirements

None

26

Col-P

PTI A

Issued: 8/25/2005

Emissions Unit ID: K001

V. Testing Requirements

None

VI. Miscellaneous Requirements

None