



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

4/20/2011

Certified Mail

Kathy Gargasz  
The Lincoln Electric Company  
22801 St. Clair Avenue  
Cleveland, OH 44117-1199

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 1318202137  
Permit Number: P0107727  
Permit Type: Administrative Modification  
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Cleveland Division of Air Quality. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
CDAQ; Pennsylvania; Canada





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
The Lincoln Electric Company**

Facility ID: 1318202137  
Permit Number: P0107727  
Permit Type: Administrative Modification  
Issued: 4/20/2011  
Effective: 4/20/2011





Division of Air Pollution Control
Permit-to-Install
for
The Lincoln Electric Company

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## Authorization

Facility ID: 1318202137  
Facility Description: Welding equipment manufacturing company.  
Application Number(s): M0001156  
Permit Number: P0107727  
Permit Description: Administrative PTI modification for 5 varnish coating lines. Permit is being modified to include BAT limits for pollutants with potential to emit <10 tons/yr per the July 2, 2010 Ohio EPA guidance memo titled "Permit Processing After U.S. District Court <10 Ton/Yr Exemption Decision".  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 4/20/2011  
Effective Date: 4/20/2011

This document constitutes issuance to:

The Lincoln Electric Company  
22801 St. Clair Avenue  
Cleveland, OH 44117-1199

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

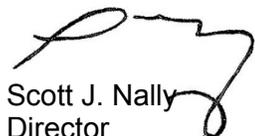
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0107727

Permit Description: Administrative PTI modification for 5 varnish coating lines. Permit is being modified to include BAT limits for pollutants with potential to emit <10 tons/yr per the July 2, 2010 Ohio EPA guidance memo titled "Permit Processing After U.S. District Court <10 Ton/Yr Exemption Decision".

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

**Group Name: varnish lines**

|                                  |                |
|----------------------------------|----------------|
| <b>Emissions Unit ID:</b>        | <b>K103</b>    |
| Company Equipment ID:            | NewVarnish01   |
| Superseded Permit Number:        | P0104699       |
| General Permit Category andType: | Not Applicable |
| <b>Emissions Unit ID:</b>        | <b>K104</b>    |
| Company Equipment ID:            | Varnish#2      |
| Superseded Permit Number:        | P0104699       |
| General Permit Category andType: | Not Applicable |
| <b>Emissions Unit ID:</b>        | <b>K105</b>    |
| Company Equipment ID:            | Varnish #3     |
| Superseded Permit Number:        | P0104699       |
| General Permit Category andType: | Not Applicable |
| <b>Emissions Unit ID:</b>        | <b>K106</b>    |
| Company Equipment ID:            | Varnish #4     |
| Superseded Permit Number:        | P0104699       |
| General Permit Category andType: | Not Applicable |
| <b>Emissions Unit ID:</b>        | <b>K107</b>    |
| Company Equipment ID:            | Varnish #5     |
| Superseded Permit Number:        | P0104699       |
| General Permit Category andType: | 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 Cleveland Division of Air Quality.
  - (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 Cleveland Division of Air Quality. 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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:

- (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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality.
- 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 Cleveland Division of Air Quality. 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**

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. Emissions Unit Group -varnish lines: K103, K104, K105, K106, K107,**

| <b>EU ID</b> | <b>Operations, Property and/or Equipment Description</b>            |
|--------------|---|
| K103         | Varnish System #1 with a 4.5 mmBtu/hr natural gas fired drying oven |
| K104         | Varnish System #2 with a 4.5 mmBtu/hr natural gas fired drying oven |
| K105         | Varnish System #3 with a 4.5 mmBtu/hr natural gas fired drying oven |
| K106         | Varnish System #4 with a 4.5 mmBtu/hr natural gas fired drying oven |
| K107         | Varnish System #5 with a 4.5 mmBtu/hr natural gas fired drying oven |

The terms and conditions of this permit supercede the terms and conditions of Permit No. P0104699 issued December 28, 2009.

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 operation(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 are identified below. 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)                         | 0.64 lb of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents<br><br>VOC emissions shall not exceed 6.38 lbs/hr.<br><br>See b)(2)a below.   |
| b. | OAC rule 3745-31-05(A)(3) as effective 11/30/2001 | From natural gas combustion:<br><br>Carbon monoxide (CO) emissions shall not exceed 0.38 lb/hr and 1.66 tons/year.<br><br>Nitrogen oxide (NOx) emissions shall not exceed 0.45 lb/hr and 1.97 tons/year.<br><br>See b)(2)c. below. |

|    |   |  |
|----|---|--|
| c. | OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06          | See b)(2)b. below.   |
| d. | OAC rule 3745-31-05(D)(1)(a) (Synthetic Minor to avoid NSR) | The combined annual VOC emissions from emissions units K103 through K107 shall not exceed 39.0 tons/year as a rolling, 12-month summation. See c)(1).    |
| e. | OAC rule 3745-21-09(U)(1)(c)                                | The VOC emission limitation specified by this rule is less stringent than the VOC emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. The lb/hr VOC emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the natural gas combustion emissions of NOx and CO from this emissions unit since the potential to emit for NOx and CO are each less than ten tons per year.

- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

c) Operational Restrictions

- (1) The maximum annual coating usage for emissions units K103 through K107 combined shall not exceed 121,875 gallons/year (less water and exempt solvents) based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the dip tank:

- a. the name and identification number of each material added to the dip tank;
  - b. the VOC content, in pounds per gallon (excluding water and exempt solvents), of each material added to the dip tank;
  - c. the amount, in gallons (excluding water and exempt solvents), of each coating employed in the dip tank;
  - d. the total VOC emissions from all coatings employed, in pounds (b\*c).
- (2) The permittee shall maintain monthly records of the following information:
- a. the combined coating usage rate for K103 through K107, in gallons (excluding water and exempt solvents), for each month of operations; and
  - b. the rolling, 12-month summation of the combined coating usage rate for K103 through K107, in gallons (excluding water and exempt solvents).
- e) Reporting Requirements
- (1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the VOC content of any material exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the exceedance occurs.
  - (2) The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify all exceedances of the rolling, 12-month coating usage limitation for emissions units K103 through K107 combined. The deviation reports shall be submitted within 45 days after the exceedance occurs.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
    - a. Emission Limitation:  
  
0.64 lb of VOC emissions per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method:  
  
Compliance shall be based upon the record keeping and reporting requirements in d)(1) and e)(1) respectively. USEPA Method 24 shall be used to determine the VOC contents of the materials added to the dip tank.
    - b. Emission Limitation:  
  
VOC emissions shall not exceed 6.38 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined through multiplying the maximum VOC content, in pounds per gallon, of each material added to the dip tank (0.59 lb/gallon) by the maximum hourly amount, in gallons, of each coating employed in the dip tank (10.81 gallons/hour).

c. Emission Limitation:

The combined annual VOC emissions from emissions units K103 through K107 shall not exceed 39.0 tons/year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping and reporting requirements in d)(1), d)(2) and e)(2) respectively. The monthly VOC emissions shall be summed on a rolling, 12-month basis for all of the emissions units combined.

d. Emission Limitation:

CO emissions shall not exceed 0.38 lb/hr.

Applicable Compliance Methods:

When firing natural gas, compliance shall be determined by multiplying an emission factor of 84 lbs of CO/mmcf by the emissions unit's maximum hourly natural gas firing rate (0.0045 mmcf/hr). The emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 while firing natural gas.

e. Emission Limitation:

1.66 TPY of CO emissions

Applicable Compliance Method(s):

The ton per year limitation was developed by multiplying the hourly CO emission rate by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/hr limitation.

f. Emission Limitation:

NOx emissions shall not exceed 0.45 lb/hr.

Applicable Compliance Methods:

When firing natural gas, compliance shall be determined by multiplying an emission factor of 100 lbs of NO<sub>x</sub>/mmcf by the emissions unit's maximum hourly natural gas firing rate (0.0045 mmcf/hr). The emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 while firing natural gas.

g. Emission Limitation:

1.97 TPY of NO<sub>x</sub> emissions

Applicable Compliance Method(s):

The ton per year limitation was developed by multiplying the hourly NO<sub>x</sub> emission rate by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/hr limitation.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.