



Environmental Protection Agency

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

9/21/2011

Jennifer McGuckin  
D.S. BROWN CO  
300 E. CHERRY ST  
NORTH BALTIMORE, OH 45872

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0387000118  
Permit Number: P0087865  
Permit Type: Renewal  
County: Wood

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Sentinil-Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-NWDO; Michigan; Indiana; Canada



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
D.S. BROWN CO

Issue Date: 9/21/2011  
Permit Number: P0087865  
Permit Type: Renewal  
Permit Description: Renewal FEPTIO for (4) spray coating operations (K001 - K004), dip coating operation (K005), metal parts cold cleaner (L001), thermal spray booth (P002) and a shot blast machine with baghouse (P003)  
Facility ID: 0387000118  
Facility Location: D.S. BROWN CO  
300 E CHERRY ST,  
NORTH BALTIMORE, OH 45872  
Facility Description: Rubber Product Manufacturing for Mechanical Use

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Andrea Moore at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
D.S. BROWN CO**

Facility ID:	0387000118
Permit Number:	P0087865
Permit Type:	Renewal
Issued:	9/21/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
D.S. BROWN CO

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 10
1. K003, North Shim coating area ..... 11
2. K004, Plate coating area..... 20
3. K005, Shim Dip Coating Line ..... 29
4. L001, Cold Cleaner Dip Tank..... 36
5. P002, Thermal Spray Coating Booth..... 43
6. P003, wheelabrator solid steel shot blast machine with baghouse ..... 46
7. Emissions Unit Group -Group #1: K001,K002, ..... 50





# Authorization

Facility ID: 0387000118  
 Application Number(s): A0018946, A0042557  
 Permit Number: P0087865  
 Permit Description: Renewal FEPTIO for (4) spray coating operations (K001 - K004), dip coating operation (K005), metal parts cold cleaner (L001), thermal spray booth (P002) and a shot blast machine with baghouse (P003)  
 Permit Type: Renewal  
 Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
 Issue Date: 9/21/2011  
 Effective Date: To be entered upon final issuance  
 Expiration Date: To be entered upon final issuance  
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

D.S. BROWN CO  
 300 E CHERRY ST  
 NORTH BALTIMORE, OH 45872

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
 Director



## Authorization (continued)

Permit Number: P0087865  
Permit Description: Renewal FEPTIO for (4) spray coating operations (K001 - K004), dip coating operation (K005), metal parts cold cleaner (L001), thermal spray booth (P002) and a shot blast machine with baghouse (P003)

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

- Emissions Unit ID: K003**  
Company Equipment ID: North Shim coating area  
Superseded Permit Number: 03-13757  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: K004**  
Company Equipment ID: Plate coating area  
Superseded Permit Number: 03-13757  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: K005**  
Company Equipment ID: Shim Dip Coating Line  
Superseded Permit Number: 03-16015  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: L001**  
Company Equipment ID: Cold Cleaner Dip Tank  
Superseded Permit Number: 03-16015  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P002**  
Company Equipment ID: Thermal Spray Coating Booth  
Superseded Permit Number: 03-13827  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P003**  
Company Equipment ID: wheelabrator solid steel shot blast machine with baghouse  
Superseded Permit Number: 03-17198  
General Permit Category and Type: Not Applicable

**Group Name: Group #1**

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	North Coating Area Paint Barn
Superseded Permit Number:	03-13757
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	South Coating Area Paint Barn
Superseded Permit Number:	03-13757
General Permit Category and Type:	Not Applicable

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

---

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

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

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

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

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

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

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

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

Area source MACT/GACT applicability may include, but may not be limited to, 40 CFR, Part 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Source).

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

**1. K003, North Shim coating area**

**Operations, Property and/or Equipment Description:**

North Shim Coating Area (Spray Coating Steel Bearing Plates and Steel Shims)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(6) through d)(8).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)a., c)(1),d)(2), d)(4), d)(5), e)(3), f)(1)a. and f)(1)b.
- 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(D)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	67.0 lbs volatile organic compounds (VOC)/day from coating operations  58.33 lbsVOC/month and 0.35 tonVOC/year from cleanup operations  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day.

- (2) Additional Terms and Conditions
  - a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:

- i. Combined annual hazardous air pollutants (HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.

- ii. The VOC emissions shall not exceed 4.69 tons per rolling, 12-month period based on a production restriction [See c)(1)].

- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(iii).

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 1400 gallons, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Months(s)</u>	<u>Maximum Allowable Coating Usage Rate (gallons)</u>
1	117
1-2	234
1-3	351
1-4	468
1-5	585
1-6	702
1-7	819
1-8	936
1-9	1053
1-10	1170
1-11	1287
1-12	1400

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

- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for coating usage in this emission unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed;
  - d. the VOC content of each coating employed, in pounds per gallon;
  - e. the total VOC emissions from each coating employed; in pounds [d)(1)b. x d)(1)d.];
  - f. the total VOC emissions from all coatings employed; in pounds per day [summation of d)(1)e.]
- (2) The permittee shall maintain monthly records of the following information for this emission unit:
  - a. the name and identification number of each coating employed;
  - b. the coating usage rate, in gallons;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;
  - e. the VOC content of each coating employed, in pounds per gallon;
  - f. the total VOC emissions from each coating employed, in tons per month [d)(2)b. x d)(2)e. x 1 ton/2000 lbs];
  - g. the total VOC emissions from all coatings employed, in tons per month [summation of d)(2)f.]; and
  - h. beginning the first month of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions, in tons.
- (3) The permittee shall collect and record the following information each month for cleanup material usage in this emission unit:

- a. the name and identification of each cleanup material employed;
- b. the VOC content of each cleanup material, in pounds per gallon;
- c. the total volume, in gallons, of each cleanup material employed;
- d. the VOC emissions from each cleanup material employed, in pounds [d)(2)b. x d)(3)c.]; and
- e. the total VOC emissions from all cleanup materials employed, in tons [summation of d)(3)d. x 1 ton/2000 lbs]; and
- f. The annual year to date VOC emissions from cleanup material usage, in tons per year [summation of d)(3)e. for each calendar month to date from January to December].

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions for from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- (4) The permittee shall collect and record the following information for HAP emissions each month, for this emissions unit:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material employed, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed, [d)(4)b. x d)(4)c.] for each individual HAP, in lbs/month;
  - e. the total emission rate for each individual HAP from all coatings and cleanup materials employed [summation of d)(4)d. for each individual HAP], in lbs/month;
  - f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed [summation of d)(4)e. for all HAPs], in lbs/month; and
  - g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- (5) The permittee shall [in conjunction with the information required in d)(4)] collect and record the following information each month for emissions units K001 - K005 and L001 combined:
- a. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

- (6) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 3.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 149.50

MAGLC (ug/m3): 10,338.00

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 3.07

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 128.40

MAGLC (ug/m3): 4,486.00

- (7) 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 and Operate 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.

- (8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that then changed emissions unit will 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.
- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;

- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs;
    - ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and
    - iii. all exceedances of the 4.69 tons VOC per rolling, 12-month period emission limitation.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(5).

- b. Emission Limitation: 4.69 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(2).

- c. Emission Limitation: 67.0 lbs of VOC/day from coating operations

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(1).

- c. Emission Limitation: 58.33 lbs of VOC/month and 0.35 ton of VOC/year from cleanup operations

Applicable Compliance Method: Compliance with the above emission limitations shall be based upon the recordkeeping requirements specified in section d)(3).

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

- d. Emission Limitation: VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(1).

- g) Miscellaneous Requirements

- (1) None.

**2. K004, Plate coating area**

**Operations, Property and/or Equipment Description:**

Plate Coating Area (Spray Coating Steel Bearing Plates and Steel Shims)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(6) through d)(8).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)a., c)(1), d)(2), d)(4), d)(5), e)(3), f)(1)a. and f)(1)b.
- 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(D)	See b)(2)a.
b.	OAC rule 3745-31-05 (A)(3)	67.0 lbs volatile organic compounds(VOC)/day from coating operations  58.33 lbsVOC/month and 0.35 tonVOC/year from cleanup operations  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day.

- (2) Additional Terms and Conditions
  - a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

- i. Combined annual hazardous air pollutants (HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.

- ii. The VOC emissions shall not exceed 2.35 tons per rolling, 12-month period based on a production restriction [See c)(1)].

- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(iii).

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 700 gallons, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Months(s)</u>	<u>Maximum Allowable Coating Usage Rate (gallons)</u>
1	58
1-2	116
1-3	174
1-4	232
1-5	290
1-6	348
1-7	406
1-8	464
1-9	522
1-10	580
1-11	638
1-12	700

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

- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for coating usage in this emission unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed;
  - d. the VOC content of each coating employed, in pounds per gallon;
  - e. the total VOC emissions from each coating employed; in pounds [d)(1)b. x d)(1)d.];
  - f. the total VOC emissions from all coatings employed; in pounds per day [summation of d)(1)e.]
- (2) The permittee shall maintain monthly records of the following information for this emission unit:
  - a. the name and identification number of each coating employed;
  - b. the coating usage rate, in gallons;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;
  - e. the VOC content of each coating employed, in pounds per gallon;
  - f. the total VOC emissions from each coating employed, in tons per month [d)(2)b. x d)(2)e. x 1 ton/2000 lbs];
  - g. the total VOC emissions from all coatings employed, in tons per month [summation of d)(2)f.]; and
  - h. beginning the first month of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions, in tons.

- (3) The permittee shall collect and record the following information each month for cleanup material usage in this emission unit:
- a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material, in pounds per gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed, in pounds [d)(2)b. x d)(3)c.]; and
  - e. the total VOC emissions from all cleanup materials employed, in tons [summation of d)(3)d. x 1 ton/2000 lbs]; and
  - f. The annual year to date VOC emissions from cleanup material usage, in tons per year [summation of d)(3)e. for each calendar month to date from January to December].

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions for from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- (4) The permittee shall collect and record the following information for HAP emissions each month, for this emissions unit:
- a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material employed, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed, [d)(4)b. x d)(4)c.] for each individual HAP, in lbs/month;
  - e. the total emission rate for each individual HAP from all coatings and cleanup materials employed [summation of d)(4)d. for each individual HAP], in lbs/month;
  - f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed [summation of d)(4)e. for all HAPs], in lbs/month; and
  - g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- (5) The permittee shall [in conjunction with the information required in d)(4)] collect and record the following information each month for emissions units K001 - K005 and L001 combined:
- a. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

- (6) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 3.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 149.50

MAGLC (ug/m3): 10,338.00

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 3.07

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 128.40

MAGLC (ug/m3): 4,486.00

- (7) 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 and Operate 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.

- (8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that then changed emissions unit will 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.
- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;

- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs;
    - ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and
    - iii. all exceedances of the 2.35 tons VOC per rolling, 12-month period emission limitation.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(5).

- b. Emission Limitation: 2.35 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(2).

- c. Emission Limitations: 67.0 lbs VOC/day from coating operations

Applicable Compliance Method: Compliance with the daily emission limitation shall be based upon the record keeping requirements specified in section d)(1).

- e. Emission Limitation: 58.33 lbs VOC/month and 0.35 ton VOC/year from cleanup operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the recordkeeping requirements specified in section d)(3).

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

- f. Emission Limitation: VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(1).

- g) Miscellaneous Requirements

- (1) None.

**3. K005, Shim Dip Coating Line**

**Operations, Property and/or Equipment Description:**

Metal Parts Adhesives Coating Line (2 dip tanks in series - conveyORIZED)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(5) through d)(7).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)a., c)(1), d)(2), d)(3), d)(4), e)(3), f)(1)a. and f)(1)b.
- 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(D)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	62.0 lbs volatile organic compound (VOC)/day from coating operations  See b)(2)b.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage never exceeding 10 gallons in any one day  See b)(2)c.

- (2) Additional Terms and Conditions
  - a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:
    - i. Combined annual hazardous air pollutants(HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.

- ii. The VOC emissions shall not exceed 6.96 tons per rolling, 12-month period based on a production restriction [See c)(1)].
  - b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(iii).
  - c. This emissions unit is exempt from the compliant coating requirements of OAC rule 3745-21-09(U)(1) provided coating usage never exceeds 10 gallons in any one day. If coating usage exceeds 10 gallons in any one day, the emissions unit will no longer qualify for the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) and the permittee will be required to comply with the requirements of OAC rule 3745-21-09(U)(1). The requirements of OAC rule 3745-21-09(U)(1) will become applicable to this emissions unit on the day coating usage exceeds 10 gallons and will continue to be applicable even on following days where coating usage is less than 10 gallons.
- c) Operational Restrictions
- (1) The maximum annual coating usage of Chemlok 205 for this emissions unit shall not exceed 775 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual coating usage of Chemlok 252X for this emissions unit shall not exceed 1500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Months(s)</u>	<u>Maximum Allowable Coating Usage Rate – Chemlok 205 (gallons)</u>	<u>Maximum Allowable Coating Usage Rate – Chemlok 252X (gallons)</u>
1	65	125
1-2	130	250
1-3	195	375
1-4	260	500
1-5	325	625
1-6	390	750
1-7	455	875
1-8	520	1000
1-9	585	1125
1-10	650	1250
1-11	715	1375

1-12	775	1500
------	-----	------

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be 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 each day for coating usage in this emission unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed;
  - d. the VOC content of each coating employed, in pounds per gallon;
  - e. the total VOC emissions from each coating employed; in pounds [d)(1)b. x d)(1)d.];
  - f. the total VOC emissions from all coatings employed; in pounds per day [summation of d)(1)e.]
- (2) The permittee shall maintain monthly records of the following information for this emission unit:
  - a. the name and identification number of each coating employed;
  - b. the coating usage rate, in gallons;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;
  - e. the VOC content of each coating employed, in pounds per gallon;
  - f. the total VOC emissions from each coating employed, in tons per month [d)(2)b. x d)(2)e. x 1 ton/2000 lbs];
  - g. the total VOC emissions from all coatings employed, in tons per month [summation of d)(2)f.]; and
  - h. beginning the first month of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions, in tons.

- (3) The permittee shall collect and record the following information for HAP emissions each month, for this emissions unit:
- a. the company identification of each coating/make-up solvent employed;
  - b. the amount of each individual HAP (lb/gallon) in each coating/make-up solvent, as applied;
  - c. the number of gallons of each coating/make-up solvent employed;
  - d. the emission rate for each individual HAP from each coating/make-up solvent employed, [d)(3)b. x d)(3)c.] for each individual HAP, in lbs/month;
  - e. the total emission rate for each individual HAP from all coatings/make-up solvents employed [summation of d)(3)d. for each individual HAP], in lbs/month;
  - f. the total HAP emission rate for all HAPs combined from all coatings/make-up solvents employed [summation of d)(3)e. for all HAPs], in lbs/month; and
  - g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- (4) The permittee shall [in conjunction with the information required in d)(3)] collect and record the following information each month for emissions units K001 - K005 and L001 combined:
- a. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.
- (5) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV ( $\mu\text{g}/\text{m}^3$ ): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.4

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 1303

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 10,300

Pollutant: Methyl Isobutyl Ketone

TLV ( $\mu\text{g}/\text{m}^3$ ): 205,000

Maximum Hourly Emission Rate (lbs/hr): 4.7

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 961

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4,880

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

(7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs;
    - ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and
    - iii. all exceedances of the 6.96 tons VOC per rolling, 12-month period emission limitation.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the emission limitations above shall be based upon the record keeping requirements in section d)(4).

- b. Emission Limitation: 6.96 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(2).

- c. Emission Limitations: 62.0 lbs VOC/day from coating operations

Applicable Compliance Method: Compliance with the daily emission limitation shall be based upon the record keeping requirements specified in section d)(1).

- d. Emission Limitation: VOC emission exemption, based on maximum daily coating usage never exceeding 10 gallons in any one day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(1). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all the coating materials employed.

g) Miscellaneous Requirements

- (1) None.

**4. L001, Cold Cleaner Dip Tank**

**Operations, Property and/or Equipment Description:**

Metal Parts Cold Cleaner - MEK - 115 gallons (conveyorized - single one-at-a-time dip)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(5) through d)(7).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)a., c)(1), d)(2), d)(3), d)(4), e)(2) and f)(1)a.
- 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(D)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	447 lbs of volatile organic compounds (VOC)/month  See b)(2)b.
c.	OAC rule 3745-21-09(O)	Operational restrictions and work practice requirements [See c)(2), c)(3), c)(4), and c)(5)]

- (2) Additional Terms and Conditions
  - a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:
    - i. Combined annual hazardous air pollutants (HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.

- ii. The VOC emissions shall not exceed 2.68 tons per rolling, 12-month period based on a production restriction [See c)(1)].
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(O).
- c) **Operational Restrictions**
  - (1) The maximum annual solvent usage for this emissions unit shall not exceed 800 gallons, based upon a rolling, 12-month summation of the solvent usage figures.

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

<u>Months(s)</u>	<u>Maximum Allowable Solvent Usage Rate (gallons)</u>
1	67
1-2	134
1-3	201
1-4	268
1-5	335
1-6	402
1-7	469
1-8	536
1-9	603
1-10	670
1-11	737
1-12	800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- (2) The cold cleaner shall be equipped with a cover that shall be designed and constructed so that it can be easily operated with one hand.
- (3) The conveyor for the cold cleaner shall be equipped to provide for draining of the cleaned parts. (Note: An internal type drainage device cannot fit into the cleaning system.)
- (4) The cold cleaner shall have a freeboard ratio greater than or equal to 0.7. "Freeboard ratio" means the freeboard height divided by the width of the degreaser air/solvent area.

- (5) The permittee shall operate and maintain the cold cleaner in accordance with the following practices to minimize solvent evaporation from the unit:
- a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
  - b. Store waste solvent in covered containers.
  - c. Close the cover whenever parts are not being handled in the cleaner.
  - d. Drain the cleaned parts until dripping ceases.
  - e. Clean only materials that are neither porous nor absorbent.

d) Monitoring and/or Recordkeeping Requirements

- (1) Any owner or operator of a solvent metal cleaning operation shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the director upon verbal or written request: the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit.
- (2) The permittee shall collect and record the following information each month regarding VOC emissions from the solvent cleaning operations for this emissions unit:
- a. the company identification for each solvent employed;
  - b. the number of gallons of each solvent employed;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage rate for each calendar month;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month solvent usage rate, in gallons;
  - e. the VOC content of each solvent employed, in pounds/gallon;
  - f. the VOC emissions rate for each solvent employed [d)(2)b. x d)(2)e.] in pounds/month;
  - g. the total VOC emissions rate for all solvents employed [summation of d)(2)f. x 1 ton/2000 lbs], in tons/month; and
  - h. beginning the first month of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions, in tons.

Note: The permittee may calculate the monthly VOC emission rate in accordance with the following formula if waste solvent is sent off-site for reclamation/disposal:

Emission rate + (the total gallons of solvent used x the density) – (the total gallons of waste solvent shipped offsite x the average solvent content of the waste solvent).

- (3) The permittee shall collect and record the following information for HAP emissions each month, for this emissions unit:
- a. the company identification of each coating/make-up solvent employed;
  - b. the amount of each individual HAP (lb/gallon) in each coating/make-up solvent, as applied;
  - c. the number of gallons of each coating/make-up solvent employed;
  - d. the emission rate for each individual HAP from each coating/make-up solvent employed, [d)(3)b. x d)(3)c.] for each individual HAP, in lbs/month;
  - e. the total emission rate for each individual HAP from all coatings/make-up solvents employed [summation of d)(3)d. for each individual HAP], in lbs/month;
  - f. the total HAP emission rate for all HAPs combined from all coatings/make-up solvents employed [summation of d)(3)e. for all HAPs], in lbs/month; and
  - g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- (4) The permittee shall [in conjunction with the information required in d)(3)] collect and record the following information each month for emissions units K001 - K005 and L001 combined:
- a. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.
- (5) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone

TLV (ugm3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 27.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,540

MAGLC (ug/m3): 14,050

- (6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not

the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will 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 low 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 and Operate 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.

- (7) The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will 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 of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs;
    - ii. all exceedances of the rolling, 12-month limitation on solvent usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative solvent usage levels; and
    - iii. all exceedances of the 2.68 tons VOC per rolling, 12-month period emission limitation.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitations: Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

Applicable Compliance Method: Compliance with the emission limitations above shall be based upon the record keeping requirements in section d)(4).

- b. Emission Limitation: 2.68 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance with the monthly and annual emission limitations shall be based upon the record keeping requirements in section d)(2).

- c. Emission Limitation: 447 lbs of VOC/month

Applicable Compliance Method: Compliance with the monthly emission limitation shall be based upon the record keeping requirements in section d)(2).

- g) Miscellaneous Requirements

- (1) None.

5. P002, Thermal Spray Coating Booth

Operations, Property and/or Equipment Description:

thermal spray (metallizing) booth used to apply blended metal coating to metal parts for corrosion protection

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)	0.06 pound particulate emissions (PE)/hour and 0.26 ton PE/year  Visible PE shall not exceed 0% opacity, as a six-minute average  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be use of a fabric filter with a maximum outlet concentration of 0.0001 grain per dry standard cubic foot. BAT requirements also include compliance with the terms and conditions of this permit.

- b. The emission limitation established by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. The color of the emissions;
    - b. The total duration of any visible emissions incident; and
    - c. Any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(1) above:
    - a. all days during which any visible fugitive particulate emissions were observed from the stack serving this emissions unit; and
    - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitations: 0.06 pound PE/hour and 0.26 ton PE/year

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum outlet concentration of 0.001 grain per dry standard cubic foot, a maximum volumetric air flow of 7,200 cubic feet per minute, 60 minutes per hour and dividing by 7,000 grain per pound. If required, the permittee shall demonstrate compliance with the hourly PE limitation using U.S. EPA Methods 1-5, which is located in 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the pound/hour emission limitation by the maximum operating schedule of 8,760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall also be demonstrated.

- b. Emission Limitation: Visible PE shall not exceed 0 percent opacity, as a six-minute average.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.

**6. P003, wheelabrator solid steel shot blast machine with baghouse**

**Operations, Property and/or Equipment Description:**

wheelabrator solid steel shot blast machine with baghouse

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. 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(F)	0.03 grains (gr) particulate matter less than 10 microns in size (PM <sub>10</sub> )/dry standard cubic foot (dscf)  9.01 tons PM <sub>10</sub> /year  Visible particulate emissions shall not exceed 0% opacity, as a six-minute average  See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05 (A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)e.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which requires the use of a baghouse:

- i. 0.03 gr PM<sub>10</sub>/dscf
- ii. 9.01 tons PM<sub>10</sub>/year;
- iii. Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. All particulate matter emissions are PM<sub>10</sub>.

c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
- ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)d.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the emissions of PM<sub>10</sub> since the potential to emit, taking into account the voluntary restriction on the use of a baghouse, is less than 10 tons per year.

- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) **Operational Restrictions**

- (1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE: [See b)(2)a.]

- a. This emissions unit shall be vented to a baghouse meeting a maximum outlet concentration of 0.03 PM<sub>10</sub>/dscf.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emissions;
- b. The total duration of any visible emissions incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

e) **Reporting Requirements**

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(1) above:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: 0.03 gr PM<sub>10</sub>/dscf and 9.01 tons PM<sub>10</sub>/year

Applicable Compliance Method: The short-term emission limitation was established in accordance with the maximum outlet grain loading concentration for the baghouse. If required, compliance with the gr/dscf emission limitation shall be determined in accordance with the test methods and procedures specified in Methods 1 – 4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.03 gr PM<sub>10</sub>/dscf, the maximum volumetric air flow rate (8,000 acfm) contributed from this emissions unit to the baghouse, and using the following conversion factors in order to convert to tons per year: 1 lb/7000 grains, 60 minutes/hour, 8760 hours/year and 1 ton/2000 lbs. Therefore, provided compliance is demonstrated with the 0.03 gr PM<sub>10</sub>/dscf limitation, compliance with the annual limitation shall be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in Methods 1 - 4 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method: If required, compliance with the visible limitation shall be determined in accordance with Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**7. Emissions Unit Group -Group #1: K001,K002,**

EU ID	Operations, Property and/or Equipment Description
K001	North Coating Area (Manual Spray Coating of Steel Bearing Plates - Modification to Increase Current Allowable Emission Limitations)
K002	South Coating Area (Spray Coating Steel Bearing Plates - Modification to Increase Current Allowable Emission Limitations)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(5) through d)(7).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., c)(1),d)(1), d)(3), d)(4), e)(3) and f)(1)a.

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(D)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	3.50 lbs volatile organic compounds (VOC)/hour from coating operations from each emission unit individually  58.33 lbs of VOC/month and 0.35 ton VOC/year from cleanup operations from each emission unit individually  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
d.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC) of coating, excluding water and exempt solvents

(2) Additional Terms and Conditions

- a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:
  - i. Combined annual hazardous air pollutants (HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.
  - ii. The VOC emissions from emission unit K001 shall not exceed 8.75 tons per rolling, 12-month period based on a production restriction [See c)(1)].
  - iii. The VOC emissions from emission unit K002 shall not exceed 8.75 tons per rolling, 12-month period based on a production restriction [See c)(1)].
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(1)(c).

c) Operational Restrictions

- (1) The maximum annual coating usage for emissions unit K001 shall not exceed 5000 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual coating usage for emissions unit K002 shall not exceed 5000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Months(s)</u>	<u>Maximum Allowable Coating Usage Rate – K001 (gallons)</u>	<u>Maximum Allowable Coating Usage Rate – K002 (gallons)</u>
1	417	417
1-2	834	834
1-3	1251	1251
1-4	1668	1668
1-5	2085	2085
1-6	2502	2502
1-7	2919	2919
1-8	3336	3336
1-9	3753	3753
1-10	4170	4170
1-11	4587	4587
1-12	5000	5000

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

- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for coating usage in each emission unit:
  - a. the name and identification number of each coating employed;
  - b. the coating usage rate, in gallons;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;
  - e. the VOC content of each coating employed (excluding water and exempt solvents, in lbs/gal);
  - f. the VOC content of each coating, as applied, in pounds per gallon;
  - g. the total VOC emission rate for each coating employed, in pounds  $[d)(1)b. \times d)(1)f.]$ ;
  - h. the total VOC emission rate for all coatings employed, in tons per month  $[\text{summation of } d)(1)g. \times 1 \text{ ton}/2000 \text{ lbs}]$ , and
  - i. beginning the first month of operation following the issuance of this permit, the rolling 12-month summation of VOC emissions, in tons.
- (2) The permittee shall collect and record the following each month for cleanup material usage in each emission unit:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;

- d. the VOC emissions from each cleanup material employed [d)(2)b. x d)(2)c.];
- e. the total VOC emissions from all cleanup materials employed [summation of d)(1)d. x 1 ton/2000 lbs], in tons; and
- f. the annual year to date VOC emissions from all cleanup materials employed, in tons per year [summation of d)(2)e. for each calendar month to date from January to December].

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- (3) The permittee shall collect and record the following information for HAP emissions each month, for each emissions unit:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material employed, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed, [d)(3)b. x d)(3)c.] for each individual HAP, in lbs/month;
  - e. the total emission rate for each individual HAP from all coatings and cleanup materials employed [summation of d)(3)d. for each individual HAP], in lbs/month;
  - f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed [summation of d)(3)e. for all HAPs], in lbs/month; and
  - g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- (4) The permittee shall [in conjunction with the information required in d)(3)] collect and record the following information each month for emissions units K001 - K005 and L001 combined:
  - a. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

- (5) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 2.43

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 101.80

MAGLC (ug/m3): 10,338.00

- (6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (7) 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 and Operate 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that then changed emissions unit will 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.
- (8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (9) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (10) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (12) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs;
    - ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels;
    - iii. all exceedances of the 8.75 tons VOC per rolling, 12-month period emission limitation from emission unit K001; and
    - iv. all exceedances of the 8.75 tons VOC per rolling, 12-month period emission limitation from emission unit K002.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, K004, K005, and L001 shall not exceed 9.9 tons per rolling 12-month period for any individual HAP or 24.9 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(4).

- b. Emission Limitations: 8.75 tons VOC per rolling, 12-month period from coating operations from K001 and 8.75 tons VOC per rolling, 12-month period from coating operations from K002

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(1).

- c. Emission Limitations: 3.50 lbs VOC/hour from coating operations for each emission unit individually

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of these emissions units. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum coating usage rate of 1.0 gallon per hour and a maximum VOC content of 3.50 pounds per gallon.

- d. Emission Limitations: 58.33 lbs VOC/month and 0.35 ton VOC/year from cleanup operations for each emission unit individually

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon recordkeeping requirements specified in section d)(2).

- e. Emission Limitation: 3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section d)(1). Formulation data or U.S. EPA method 24 shall be used to determine the VOC content of the coatings.

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

D.S. BROWN CO

**Permit Number:** P0087865

**Facility ID:** 0387000118

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

g) Miscellaneous Requirements

(1) None.