Facility ID: 0278080139 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0278080139 Issuance type: Title V Draft Permit

Part II - Specific Facility Terms and Conditions

a **State and Federally Enforceable Section**

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

   (Authority for term: OAC rule 3745-25-03)

2. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. The text of this rule is included in Attachment 1 hereto, and is hereby incorporated into this permit as if fully rewritten.

   The following emissions unit is subject to 40 CFR Part 63, Subpart MMMM: emissions unit K001.

3. The following insignificant emissions units are located at this facility:

   P002 - Press #3 Billet Furnace;
   P004 - Drying Oven [PTI No.02-5937(effective 8/14/94)];
   Z001 - Press #4 Billet Furnace;
   Z002 - Stage 1 Hot Alkaline Cleaner [PTI No.02-5937(effective 8/14/94)];
   Z003 - Paint Bake Oven;
   Z004 - Paint Line Air Make-up Unit;
   Z006 - Aluminum Aging Oven A - Belco;
   Z007 - Aluminum Aging Oven B - Belco;
   Z008 - Press #5 Billet Furnace;
   Z009 - Paint Hook Cleaner;
   Z013 - Thermal Pour and Debridge Process; and
   Z022 - Die Cleaning with Scrubber.
   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

   (Authority for term: OAC rule 3745-77-07(A)(13))

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0278080139 Issuance type: Title V Draft Permit

b **State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because it is not subject to any applicable requirements or because it meets the "de minimis" criteria established in OAC rule 3745-15-05:

   Z010 - Extrusion Press Cutting Torch #4;
   Z011 - Extrusion Press Cutting Torch #3;
   Z012 - Extrusion Press Cutting Torch #5;
   Z014 - Air Make up Unit;
   Z015 - Air Make up Unit;
   Z016 - Air Make up Unit;
   Z017 - Air Make up Unit;
   Z018 - Air Make up Unit;
   Z020 - Dock Heater;
   Z024 - Thermal Pour Space Heater; and
   Z025 - Packing Space Heater.

Go to Part III for Emissions Unit K001

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0278080139 Issuance type: Title V Draft Permit

Part III - Terms and Conditions for Emissions Units

Go to the top of this document

Facility ID: 0278080139 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Electrostatic Spray Paint Line for Aluminum Extrusions (K001)	OAC rule 3745-31-05(A)(3) (PTI 02-09487)	See sections A.I.2.c and A.I.2.d below. Volatile organic compounds (VOC) emissions shall not exceed 140 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-21-09(U)(1)(h), 3745-17-07(A), and 3745-17-11.
	OAC rule 3745-21-09(U)(1)(c)	See section A.I.2.a below.
	OAC rule 3745-21-09(U)(1)(h)	See section A.I.2.b below.
	OAC rule 3745-17-11	Particulate Emissions (PE) shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	40 CFR Part 63, Subpart MMMM	See section A.I.2.e below.

2. **Additional Terms and Conditions**

a. The volatile organic compound (VOC) content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average, for extreme performance coatings.

b. The volatile organic compound (VOC) content shall not exceed 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average, for high performance architectural aluminum coatings.

c. The emissions from the coatings employed in this emissions unit shall not exceed 768 pounds of VOC per day based on an average for each calender month.

d. Only extreme performance coatings and high performance architectural aluminum coatings shall be employed in this emissions unit.

e. See Attachment 1 referenced in Part II - Specific Facility Terms and Conditions of this permit. This attachment contains the requirements of 40 CFR Part 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for this emissions unit:

   a. the name, identification, and type of each coating, as applied;

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

   c. the daily volume-weighted average VOC content of all coatings used as extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and

   d. the daily volume-weighted average VOC content of all coatings used as high performance architectural aluminum coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

   (Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(h), OAC rule 3745-21-10(B)(9) and PTI 02-09487)

2. The permittee shall collect and record the following information each month for this emissions unit:

   a. the total VOC emissions from all coatings employed, in pounds;

   b. the total days of operation of the emissions unit during the month; and

   c. the average daily VOC emission rate in pounds of VOC per day, i.e., (a)/(b) for each month.

   (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

   (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

4. The permittee shall collect and record the following information each month for this emissions 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 total VOC emissions from all cleanup materials employed, in tons;

   e. the total VOC emissions from all coatings and all cleanup materials employed, in tons; and

   f. the total, rolling, 12-month VOC emissions from all coatings and all cleanup materials employed (for each month plus the previous 11 months), in tons.

   (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

   (Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(i) and PTI 02-09487)

2. The permittee shall submit deviation (excursion) reports that identify each month where the average daily VOC emission rate for the coatings exceeded 768 pounds per day and/or the rolling, 12-month VOC emissions from all coatings and all cleanup materials exceeded 140 tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

   (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

   (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the

previous calendar year. These reports shall be submitted by April 15 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance with the emission limitation(s) in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation :

3.5 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average for extreme performance coatings.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-04(B)(5) and PTI 02-09487)

b. Emission Limitation :

6.2 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average for high performance architectural aluminum coatings.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-04(B)(5) and PTI 02-09487)

c. Emission Limitation:

PE shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

PE = maximum coating solids usage rate (in pounds per hour) X (1-TE) X (1-CE)

where:

PE = particulate emission rate (lb/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = control efficiency of the control equipment.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

d. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1) and PTI 02-09487)

e. Emission Limitation:

VOC emissions shall not exceed 768 pounds per day based on an average for each calender month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

f. Emission Limitation:

VOC emissions shall not exceed 140 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.

Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-09487)

Go to the top of this document
Go to the top of Part III for this Emissions Unit
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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278080139 Issuance type: Title V Draft Permit

Go to the top of this document

Facility ID: 0278080139 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Electrostatic Spray Paint Line for Aluminum Extrusions (K001)		

2. **Additional Terms and Conditions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit [K001] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene
   TLV (mg/m3): 434
   Maximum Hourly Emission Rate (lbs/hr): 8.0
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602
   MAGLC (ug/m3): 10333

   Pollutant: Toluene
   TLV (mg/m3): 377
   Maximum Hourly Emission Rate (lbs/hr): 7.8
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 806.5
   MAGLC (ug/m3): 8977

   Pollutant: MEK
   TLV (mg/m3): 590
   Maximum Hourly Emission Rate (lbs/hr): 1.6
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 201.6
   MAGLC (ug/m3): 14047

   Pollutant: Butoxyethanol
   TLV (mg/m3): 121
   Maximum Hourly Emission Rate (lbs/hr): 4.8
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602.0
   MAGLC (ug/m3): 2880

   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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 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 the 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.

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

Go to the top of this document
Go to the top of Part III for this Emissions Unit
THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None