



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL**

**CLARK COUNTY**

**Application No: 08-04912**

**Fac ID: 0812100584**

**DATE: 2/21/2008**

American Steel Fabricators, LLC  
Joseph Beatty  
2748 Columbus Ave  
Springfield, OH 45503-3204

**CERTIFIED MAIL**

|  |                              |
|--|------------------------------|
|  | TOXIC REVIEW                 |
|  | PSD                          |
|  | SYNTHETIC MINOR              |
|  | CEMS                         |
|  | MACT                         |
|  | NSPS                         |
|  | NESHAPS                      |
|  | NETTING                      |
|  | MAJOR NON-ATTAINMENT         |
|  | MODELING SUBMITTED           |
|  | GASOLINE DISPENSING FACILITY |

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

RAPCA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

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**Permit To Install  
Terms and Conditions**

**Issue Date: 2/21/2008  
Effective Date: 2/21/2008**

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**FINAL PERMIT TO INSTALL 08-04912**

Application Number: 08-04912

Facility ID: 0812100584

Permit Fee: **\$400**

Name of Facility: American Steel Fabricators, LLC

Person to Contact: Joseph Beatty

Address: 2748 Columbus Ave  
Springfield, OH 45503-3204

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2748 Columbus Ave.  
Springfield, Ohio**

Description of proposed emissions unit(s):

**Paint Booth.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

*Chris Korleski*

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Chris Korleski  
Director



## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### **13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC              | 7.93                 |
| Particulate      | 3.23                 |

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K002) - Structural steel primer coating operations**

| Applicable Rules/Requirements                                                 | Applicable Emissions Limitations/Control Measures                                                                                                                                                                |
|-------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OAC rule 3745-31-05(A)(3)(b)                                                  | See A.2.a.                                                                                                                                                                                                       |
| OAC rule 3745-31-05(C)<br>(voluntary restriction to avoid<br>BAT, State only) | The volatile organic compound (VOC) emissions rate from this emissions unit shall not exceed 7.93 tons per year (TPY).<br><br>The particulate emissions (PE) from this emissions unit shall not exceed 3.23 TPY. |
| OAC rule 3745-21-09(U)(1)(d)                                                  | The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon of coating applied, excluding water and exempt solvents.                                               |
| OAC rule 3745-17-11(C)                                                        | See A.2.b.                                                                                                                                                                                                       |

**2. Additional Terms and Conditions**

- 2.a Permit to Install #08-04912 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - I. The volume of coatings used in this emissions unit shall not exceed 4,495 gallons per year to limit VOC and particulate emissions to less than 10 tons per year (TPY).
- 2.b Pursuant to OAC rule 3745-17-11(A)(1)(I) surface coating processes for which the owner or operator demonstrates to the satisfaction of the director that, due to the large size of the items being coated, is technically infeasible and/or economically unreasonable (in terms of cost-effectiveness) to employ an enclosure (or hooding) and control device for the control of the particulate emissions are exempt from complying with the

particulate emissions control requirements of OAC rule 3745-17-11(C).

**B. Operational Restrictions**

1. The volume of coatings used in this emissions unit shall not exceed 4,495 gallons per year.

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

1. The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
  - a. the company identification of each coating, as applied; and
  - b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$  is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  is the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  is the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall collect and record the following information each month for this emissions unit.
  - a. The company identification of each coating material applied.
  - b. The volume, in gallons, of each coating material applied.
  - c. The VOC content of each coating material applied, in lbs VOC/gallon.
  - d. The VOC emission rate for all coatings applied, in pounds or tons per month (the sum of b x c for all coating materials).

#### D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the VOC content of the coating applied in this emissions unit exceeded 3.5 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall submit annual reports that specify the total volume of coatings applied, in gallons, in this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### E. Testing Requirements

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

- a. Emissions Limitation -

The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method -

Compliance shall be based on coating formulation data and if required VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

- b. Emissions Limitation -

The volume of coatings used in this emissions unit shall not exceed 4,495 gallons per year.

Applicable Compliance Method -

Compliance shall be based on the record keeping requirements of Section C.2. and shall be the sum of the monthly application rates for each calendar year.

- c. Emissions Limitation -

The VOC emissions from this emissions unit shall not exceed 7.93 TPY.

Applicable Compliance Method -

Compliance shall be based on the record keeping requirements of Section C.2. and shall be the sum of the monthly emission rates for each calendar year.

- d. Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 3.23 TPY.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where E = PE rate (20.9 lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.5); and

CE = fractional control efficiency of the control equipment (0.7).

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit assuming the source is operated less than 2,060 hours/year. (The 4,495 gallons per year coatings usage limitation is based on 2,060 hours of operation at a maximum application rate of 2.2 gallons/hour).

**F. Miscellaneous Requirements**

None

**American Steel Fabricators, LLC**  
**PTI Application: 08-04912**  
**Issued: 2/21/2008**

**Facility ID: 0812100584**

SIC CODE 3479 SCC CODE 4-02-02-501 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Structural steel primer coating operations

DATE INSTALLED April 2005

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants         | Air Quality Description | Actual Emissions Rate |               | PTI Allowable   |               |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
|                    |                         | Short Term Rate       | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter |                         |                       | 1.28          |                 | 3.23          |
| PM <sub>10</sub>   |                         |                       |               |                 |               |
| Sulfur Dioxide     |                         |                       |               |                 |               |
| Organic Compounds  |                         |                       | 2.4           |                 | 7.93          |
| Nitrogen Oxides    |                         |                       |               |                 |               |
| Carbon Monoxide    |                         |                       |               |                 |               |
| Lead               |                         |                       |               |                 |               |
| Other: Air Toxics  |                         |                       |               |                 |               |

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Not Subject - Coatings use limited to 4,495 gallons per year.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES XX NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_