☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **02-09487**

Alcoa Extruded Construction Products

A. Source Description

This synthetic minor write up is from the original permit to install for Excel. They are now seeking a modification to that permit to allow for expanded hours of operation , which have increased since the original application was filed. Excel Extrusions, an existing facility that extrudes and manufactures aluminum parts, proposes to install a parts washer and surface coating line. The coating line will consist of two electrostatic booths employing reciprocating discs that can paint extrusions up to 18 feet in length. The predominant paints to be used are high solids paints which fit the category of "extreme performance coatings", with some use of fluorocarbon paints which fit the category of "high performance architectural aluminum coating", under Ohio EPA definitions in Ohio Administrative Code (OAC) Rule 3745-21-01. These two types of coatings will be required to meet a limitation of 3.5 and 6.2 pounds of VOC per gallon of coating, excluding water, respectively.

B. Facility Emissions and Attainment Status

Excel is a proposed new source of VOCs. It will be located in Trumbull County which has recently been designated attainment for ozone. Excel is currently operating a paint line in Cuyahoga County; they plan to discontinue painting operations there and construct a new line in Warren, Ohio. Compliance with the PTI will insure that the facility operates as a minor stationary source.

C. New Source Emissions

Excel has estimated they will use about 56,000 gallons of paint per year, at a ratio of 80:20, extreme performance to architectural. At allowable VOC limitations of 3.5 and 6.2 pounds of VOC per gallon, Excel's estimated allowable emissions will be:

56,000 gal./yr. x .8 x 3.5# VOC/gal. = 156,800#/yr.
56,000 gal./yr. x .2 x 6.2# VOC/gal. = 69,440#/yr

for a total of 226,240 pounds VOC per year, or 114 tons per year.

However, the paint line which travels at 12 feet per minute has the capability of painting 5,000 pounds of aluminum per hour. Based on a usage rate of 1 gallon for 350 pounds of aluminum, and 8,760 hours per year, maximum potential emissions would be:

5,000# Alum./hr. x 1 gal./350# Alum. x .8 x 3.5# VOC/gal. x 8,760 = 350,400#/yr.
5,000# Alum./hr. x 1 gal./350# Alum. x .2 x 6.2# VOC/gal. x 8.760 = 155,177#/yr.

totaling 505,577 pounds Voc per year, or 253 tons per year.

The permit-to-install will contain terms and conditions which will limit Excel to 140 tons VOC per year over a rolling 12-month period.

D. Facility Operation and Product Demand

Excel will produce products for the construction trade, thus, production will vary with the outdoor construction season. For the first 12 months of operation, Excel will be restricted to emissions of 11.7 tons of VOC per month. After one year, emissions will be calculated and restricted on a 365-day rolling average. Facility-wide VOC emissions will be limited to 140 tons per year to allow for clean-up and miscellaneous emissions from gas-fired equipment.

E. Conclusion

Excel Extrusions, Inc., in using compliant coatings, will meet the requirements of OAC Rule 3745-21-09(U). The use of emission restrictions, record keeping and use of a 12-month rolling emission restriction will insure they stay below Federal Prevention of Significant Deterioration review for ozone (VOC).

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
TRUMBULL COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 02-09487

DATE: 2/27/2001

Alcoa Extruded Construction Products
Charles Cavolo
PO Box 1080 1000 University St NE
Warren, OH 44482

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NEDO WV PA Eastgate Dev & Trans Study Mahoning-Trumbull APC

DRAFT PERMIT TO INSTALL 02-09487

Application Number:	02-09487
APS Premise Number:	0278080139
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Alcoa Extruded Construction Products
Person to Contact:	Charles Cavolo
Address:	PO Box 1080 1000 University St NE Warren, OH 44482

Location of proposed air contaminant source(s) [emissions unit(s)]:
1000 University St NE
Warren, Ohio

Description of proposed emissions unit(s):
Administrative Modification of PTI 02-09487 issued on Sept. 18, 1996 to correct the annual VOC emission limit listed in the Total Permit to Install Emission Summary Table.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

B. State Only Enforceable 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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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.

4. 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.

5. 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.

6. 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.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. 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.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	140

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Electrostatic spray paint line for aluminum extrusions	OAC rule 3745-31-05(A)(3)	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)(1), and 3745-17-11(B)(1).
	OAC rule 3745-21-09(U)(1)(c)	See A.I.2.a.
	OAC rule 3745-21-09(U)(1)(h)	See A.I.2.b.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	PE: 0.551 lb/hr
	OAC rule 3745-35-07	See A.I.2.c. 140 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions.

2. Additional Terms and Conditions

2.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.

2.b The 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.

2.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.

II. Operational Restrictions

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:

   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.

   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.

2. The permittee shall collect and record the following information each month for the line:

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

   b. The total days of operation of the coating line each month.

   c. The average daily VOC emission rate in pounds of VOC per day. This shall be calculated by dividing (a) by (b) for each month.

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.

4. The permittee shall collect and record the following information for the purpose of determining monthly and annual VOC emissions:

   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 coatings and cleanup materials employed, in tons.

   e. The total VOC emissions from all coatings and cleanup materials employed from this month plus the previous 11 months, in tons.

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) exceed(s) 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.

2. The permittee shall submit deviation (excursion) reports which identify each month where the average daily VOC emission rate exceeded 768 pounds per day for emissions unit K001.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.

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.

4. The permittee shall submit quarterly deviation (excursion) reports as described in the general terms and conditions which identify all exceedances of the rolling,12-month emissions limitation for VOC.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. 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 4.3 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.

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 4.3 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.

c. Emission Limitation:

0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, 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 emissions 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

CE = control efficiency of the control equipment

d. Emission Limitation:

20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S. EPA reference method 9, if required by the Ohio EPA

e. Emission Limitation:

768 pounds of VOC per day based on an average for each calender month.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.2.

f. Emission Limitation:

140 tons per year VOC

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.4.of this permit.

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

VI. Miscellaneous Requirements

1. The terms and conditions of this PTI modification supersede those established in the original PTI 02-9487, issued November 14, 1996.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Electrostatic spray paint line for aluminum extrusions	none	none

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

The permit to install for this emissions unit K001 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 (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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio

EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Emissions Unit ID: K001

NEW SOURCE REVIEW FORM B

PTI Number: 02-09487 Facility ID: 0278080139

FACILITY NAME Alcoa Extruded Construction Products

FACILITY DESCRIPTION Administrative Modification of PTI 02-09487 issued on Sept. 18, 1996 to correct the annual VOC emission limit listed in the Total Permit to Install Emission Summary Table.

CITY/TWP Warren

SIC CODE 3479 SCC CODE 40202501 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Electrostatic spray paint line for aluminum extrusions

DATE INSTALLED 1996

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					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	768#/day	120	768#/day	140
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?
Use of compliance coatings

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Original pti passed modeling

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*? X in original YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

Emissions Unit ID: K001

NEW SOURCE REVIEW FORM B

PTI Number: 02-09487 Facility ID: 0278080139

FACILITY NAME Alcoa Extruded Construction Products

FACILITY DESCRIPTION	Administrative Modification of PTI 02-09487 issued on Sept. 18, 1996 to correct the annual VOC emission limit listed in the Total Permit to Install Emission Summary Table.	CITY/TWP	Warren

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000c.wpd	☒	
Modeling form/results	☐	0000000s.wpd	☐	☒
PTI Application (complete or partial)*	☐	0000000a.wpd	☐	☐
BAT Study	☐	0000000b.wpd	☐	☐
Other/misc.	☐	0000000t.wpd	☐	☐

*** Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.**

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☒ Synthetic Minor Determination and/or ☐ Netting Determination

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

This synthetic minor write up is from the original permit to install for Excel. They are now seeking a modification to that permit to allow for expanded hours of operation , which have increased since the original application was filed.

Excel Extrusions, an existing facility that extrudes and manufactures aluminum parts, proposes to install a parts washer and surface coating line. The coating line will consist of two electrostatic booths employing reciprocating discs that can paint extrusions up to 18 feet in length. The predominant paints to be used are high solids paints which fit the category of "extreme performance coatings", with some use of fluorocarbon paints which fit the category of "high performance architectural aluminum coating", under Ohio EPA definitions in Ohio Administrative Code (OAC) Rule 3745-21-01. These two types of coatings will be required to meet a limitation of 3.5 and 6.2 pounds of VOC per gallon of coating, excluding water, respectively.

Emissions Unit ID: K001

NEW SOURCE REVIEW FORM B

PTI Number: 02-09487 Facility ID: 0278080139

FACILITY NAME Alcoa Extruded Construction Products

FACILITY DESCRIPTION	Administrative Modification of PTI 02-09487 issued on Sept. 18, 1996 to correct the annual VOC emission limit listed in the Total Permit to Install Emission Summary Table.	CITY/TWP	Warren

B. Facility Emissions and Attainment Status

Excel is a proposed new source of VOCs. It will be located in Trumbull County which has recently been designated attainment for ozone. Excel is currently operating a paint line in Cuyahoga County; they plan to discontinue painting operations there and construct a new line in Warren, Ohio. Compliance with the PTI will insure that the facility operates as a minor stationary source.

C. New Source Emissions

Excel has estimated they will use about 56,000 gallons of paint per year, at a ratio of 80:20, extreme performance to architectural. At allowable VOC limitations of 3.5 and 6.2 pounds of VOC per gallon, Excel's estimated allowable emissions will be:

56,000 gal./yr. x .8 x 3.5# VOC/gal. = 156,800#/yr.
56,000 gal./yr. x .2 x 6.2# VOC/gal. = 69,440#/yr

for a total of 226,240 pounds VOC per year, or 114 tons per year.

However, the paint line which travels at 12 feet per minute has the capability of painting 5,000 pounds of aluminum per hour. Based on a usage rate of 1 gallon for 350 pounds of aluminum, and 8,760 hours per year, maximum potential emissions would be:

5,000# Alum./hr. x 1 gal./350# Alum. x .8 x 3.5# VOC/gal. x 8,760 = 350,400#/yr.
5,000# Alum./hr. x 1 gal./350# Alum. x .2 x 6.2# VOC/gal. x 8.760 = 155,177#/yr.

totaling 505,577 pounds Voc per year, or 253 tons per year.

The permit-to-install will contain terms and conditions which will limit Excel to 140 tons VOC per year over a rolling 12-month period.

D. Facility Operation and Product Demand

Excel will produce products for the construction trade, thus, production will vary with the outdoor construction season. For the first 12 months of operation, Excel will be restricted to emissions of 11.7 tons of VOC per month. After one year, emissions will be calculated and restricted on a 365-day rolling average. Facility-wide VOC emissions will be limited to 140 tons per year to allow for clean-up and miscellaneous emissions from gas-fired equipment.

E. Conclusion

Emissions Unit ID: K001

NEW SOURCE REVIEW FORM B

PTI Number: 02-09487 Facility ID: 0278080139

FACILITY NAME Alcoa Extruded Construction Products

FACILITY DESCRIPTION	Administrative Modification of PTI 02-09487 issued on Sept. 18, 1996 to correct the annual VOC emission limit listed in the Total Permit to Install Emission Summary Table.	CITY/TWP	Warren

Excel Extrusions, Inc., in using compliant coatings, will meet the requirements of OAC Rule 3745-21-09(U). The use of emission restrictions, record keeping and use of a 12-month rolling emission restriction will insure they stay below Federal Prevention of Significant Deterioration review for ozone (VOC).

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

This is a modification to an existing PTI of the same number. The only change is to the TPY of VOC , this will be an increase from 120 to 140 TPY to reflect the current short term allowable(unchanged) of 768 lb/day at 8760 hr/year. The original pti was done in old format, below is T&C in new format, using language directly from the Title V permit issued draft 6/22/00.

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	140