

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

Permit To Install **02-14347**

McMorrow Brothers Inc

A. Source Description

McMorrow Brothers is located at 715 Smithville Road in Orrville, Wayne County, Ohio. Wayne County is currently designated as attainment for all criteria pollutants. The facility operates under SIC code 3479 and coats miscellaneous metal.

B. Facility Emissions and Attainment Status

McMorrow Brothers operates three paint dip lines. The facility's uncontrolled potential to emit is 134.1 tons VOC per year. The facility's uncontrolled potential to emit for HAPs is 50.5 tons combined HAPs and 20.5 tons per year of a single HAP (methyl isobutyl ketone). The facility has proposed to restrict daily coating use such that the potential VOC emissions will be 61.24 tons per year, combined HAPs emissions will be 23.1 tons per year and individual HAP emissions will not be more than 9.4 tons per year (MIBK). Thus, the facility will qualify as a synthetic minor facility and will not be subject to the Title V permitting program.

C. Source Emissions

McMorrow Brothers operates three paint dip lines. K001, the east dip tank paint line, coats electric motor housings and is subject to OAC rule 3745-21-09 (U)(1)(c), 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. The line was installed in April of 1986, without first obtaining a permit to install. The line has potential uncontrolled VOC emissions of 12.45 pounds per hour and 54.53 tons per year. The facility proposes to limit coating application so as to restrict VOC emissions to 12.45 lbs per hour and 24.9 tons per year.

K002, the west dip tank paint line, coats electric motor housings and is subject to OAC rule 3745-21-09 (U)(1)(c), 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. The line was installed in April of 1986 without first obtaining a permit to install. The line has potential uncontrolled VOC emissions of 10.45 pounds per hour and 45.8 tons per year. The facility proposes to limit coating application so as to restrict VOC emissions to 10.45 pounds per hour and 20.91 tons per year.

K003, the big dip tank paint line, coats electric motor housings and is subject to OAC rule 3745-21-09 (U)(1)(c), 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. The line was installed in April of 1986 without first obtaining a permit to install. The line has potential uncontrolled VOC emissions of 7.71 pounds VOC per hour and 33.8 tons per year. The facility proposes to limit coating application so as to restrict VOC emissions to 7.71 pounds per hour and 15.43 tons per year.

McMorrow Brothers has been unable to locate compliant coatings which fulfill the requirements of its customers. The facility has completed a BAT study, which concluded the addition of control equipment is not economically feasible. The facility has proposed to use coatings which will not exceed 5.25 lbs VOC per gallon, excluding water and exempt solvents, via OAC rule 3745-21-09 (U)(2)(f). Total facility VOC emissions will be restricted to 61.24 tons per year. Facility-wide combined HAP emissions will be restricted to 23.1 tons per year. Emissions of any single HAP will not exceed 9.4 tons per year.

D. Conclusion

This permit will restrict the potential to emit for McMorrow Brothers to less than 100 TPY of VOC, less than 10 TPY of a single HAP, and less than 25TPY of combined HAPs. Thus, this facility will not be subject to the Title V permitting requirements.



State of Ohio Environmental Protection Agency

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

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 02-14347

DATE: 3/13/2001

McMorrow Brothers Inc
William McMorrow
715 Smithville Rd
Orrville, OH 44668

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 or 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 **\$1200** 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



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Terms and Conditions

Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**DRAFT PERMIT TO INSTALL 02-14347**

Application Number: 02-14347
APS Premise Number: 0285010336
Permit Fee: **To be entered upon final issuance**
Name of Facility: McMorrow Brothers Inc
Person to Contact: William McMorrow
Address: 715 Smithville Rd
Orrville, OH 44668

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

715 Smithville Rd
Orrville, Ohio

Description of proposed emissions unit(s):

3 Dip Tank Paint Lines.

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

McMorrow Brothers Inc

Facility ID: 0285010336

PTI Application: 02-14347

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the 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.

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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

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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

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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.

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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

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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).

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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**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	61.24
combined HAPs	23.1
single HAP	9.4

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - East dip tank line	OAC rule 3745-31-02 (A)(2)	VOC - 12.45 lbs/hour and 24.90 tons per rolling 12-months single HAP - 1,566.7 lbs/month, facility-wide and 9.4 tons per rolling 12-months, facility-wide combined HAPs - 3,850 lbs/month, facility-wide and 23.1 tons per rolling 12-months, facility-wide
	OAC rule 3745-21-09 (U)(2)(f)	5.25 lbs VOC per gallon coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (A)(3)	See A.I.2.a. and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The permittee shall be restricted to the use of not more than 4.5 gallons of Fast Dry Blue Green Enamel 8121 per hour.
- 2.b The permittee shall be restricted to the use of not more than 2.1 gallons of Kem Flash Green E61GC702 per hour.

McMc

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance**II. Operational Restrictions**

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

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	2.12	0.82	1.93
2	4.20	1.60	3.85
3	6.27	2.38	5.77
4	8.43	3.16	7.69
5	10.41	3.94	9.61
6	12.48	4.72	11.53
7	14.55	5.50	13.45
8	16.62	6.28	15.37
9	18.69	7.06	17.29
10	20.76	7.84	19.21
11	22.83	8.62	21.13
12	24.90	9.40	23.10

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 24.90 tons VOC
Tons single HAP emissions current month	+	Previous 11 months tons single HAP	Total 12-month < or = 9.4 tons single HAP
Tons combined HAPs emissions current month	+	Previous 11 months tons combined HAPs	Total 12-month < or = 23.1 tons combined HAPs

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III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line.
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information for each day for the coating operation.
 - a. The company identification for each coating cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., $b \times c$).
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials (i.e., $(d)/(e)$, in pounds per hour (average)).
3. The permittee shall collect and record the following information each month.
 - a. The name and identification number of each coating, as applied.
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
 - d. The number of gallons of each coating employed.

- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f).
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material).
- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall continue to research potential "lower solvent" coatings for implementation in this emissions unit. The facility shall maintain records that summarize the results of that research.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
- 2. The permittee shall submit written quarterly deviation (excursion) reports to the Director (the Ohio EPA Northeast District Office) of any record showing a deviation from the hourly and rolling 12-month VOC emissions limitations. 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 following the end of the calendar month.

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3. The permittee shall submit written quarterly deviation (excursion) reports to the Director (the Ohio EPA Northeast District Office) of any record showing a deviation from the single and combined monthly and rolling 12-month HAP emissions limitations. 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 following the end of the calendar month.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance.

4. The permittee shall submit annual reports that detail the results of the research concerning the use of "lower solvent" VOC coatings in this emissions unit. Each report shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

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):

Emission Limitation:
12.45 lbs VOC per hour

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

Emission Limitation:
24.90 tons VOC per rolling 12-months and the limitations established for the first 12 months of operation

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

Emission Limitation:
1,566.7 pounds per month and 9.4 tons single HAP per rolling 12-month and the limitations established for the first 12 months of operation.

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.3.

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Emissions Unit ID: K001

Emission Limitation:

3,850 pounds per month and 23.1 tons combined HAPs per rolling 12-months and the limitations established for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.3.

Emission Limitation:

5.25 lbs VOC per gallon coating

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1.

Emission Limitation:

4.5 gallons of Fast Dry Blue Green Enamel per hour

2.1 gallons of Kem Flash Green per hour

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.2.

VI. Miscellaneous Requirements

1. In accordance with section OAC 3745-35-07, the following terms and conditions are federally enforceable: A.I., A.II., A.III., A.IV., and A.V.

McMc

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - East dip tank line	Ohio's Air Toxics Policy	

2. Additional Terms and Conditions

2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

1. 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	TLV (mg/m ³)	Maximum Hourly Emission Rate (lbs/hour)	Predicted 1-Hour Maximum Ground-Level Concentration (ug/m ³)	MAGLC (ug/m ³)
Xylene	434.19	13.49	10,240	10,338
Ethylbenzene	434.19	0.4	301.1	10,338

McMc

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Methyl Isobutyl Ketone	204.83	5.48	4,155	4,876.8
VM & P Naphtha	1,399	13.49	10,240	33,304

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install 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

Emissions Unit ID: K001

- 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

McMc
PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - West dip tank paint line	OAC rule 3745-31-02 (A)(2)	VOC - 10.45 lbs/hour and 20.91 tons per rolling 12-months
		single HAP - 1,566.7 lbs/month, facility-wide and 9.4 tons per rolling 12-months, facility-wide
		combined HAPs - 3,850 lbs/month, facility-wide and 23.1 tons per rolling 12-months, facility-wide
	OAC rule 3745-21-09 (U)(2)(f)	5.25 lbs VOC per gallon coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (A)(3)	See A.I.2.a. and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The permittee shall be restricted to the use of not more than 4.5 gallons of Fast Dry Blue Green Enamel 8121 per hour.
- 2.b The permittee shall be restricted to the use of not more than 2.1 gallons of Kem Flash Green E61GC702 per hour.

II. Operational Restrictions

**McMc
PTI A**

Emissions Unit ID: K002

Issued: To be entered upon final issuance

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

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	1.76	0.82	1.93
2	3.48	1.60	3.85
3	5.22	2.38	5.77
4	6.96	3.16	7.69
5	8.70	3.94	9.61
6	10.44	4.72	11.53
7	12.18	5.50	13.45
8	13.92	6.28	15.37
9	15.66	7.06	17.29
10	17.40	7.84	19.21
11	19.14	8.62	21.13
12	20.91	9.40	23.10

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 20.91 tons VOC
Tons single HAP emissions current month	+	Previous 11 months tons single HAP	Total 12-month < or = 9.4 tons single HAP
Tons combined HAPs emissions current month	+	Previous 11 months tons combined HAPs	Total 12-month < or = 23.1 tons combined HAPs

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line.
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information for each day for the coating

operation.

- a. The company identification for each coating cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., $b \times c$).
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials (i.e., $(d)/(e)$, in pounds per hour (average)).
3. The permittee shall collect and record the following information each month.
- a. The name and identification number of each coating, as applied.
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f).
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period

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(for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material).

- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

4. The permittee shall continue to research potential "lower solvent" coatings for implementation in this emissions unit. The facility shall maintain records that summarize the results of that research.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit written quarterly deviation (excursion) reports to the Director (the Ohio EPA Northeast District Office) of any record showing a deviation from the hourly and rolling 12-month VOC emissions limitations. 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 following the end of the calendar month.
3. The permittee shall submit written quarterly deviation (excursion) reports to the Director (the Ohio EPA Northeast District Office) of any record showing a deviation from the single and combined monthly and rolling 12-month HAP emissions limitations. 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 following the end of the calendar month.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance.

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Facility ID: 0285010336

Emissions Unit ID: K002

4. The permittee shall submit annual reports that detail the results of the research concerning the use of "lower solvent" VOC coatings in this emissions unit. Each report shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

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):

Issued: To be entered upon final issuance

Emission Limitation:
10.45 lbs VOC per hour

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

Emission Limitation:
20.91 tons VOC per rolling 12-months and the limitations established for the first 12 months of operation

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

Emission Limitation:
1,566.7 pounds per month and 9.4 tons single HAP per rolling 12-month and the limitations established for the first 12 months of operation.

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.3.

Emission Limitation:
3,850 pounds per month and 23.1 tons combined HAPs per rolling 12-months and the limitations established for the first 12 months of operation

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.3.

Emission Limitation:
5.25 lbs VOC per gallon coating

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.1.

Emission Limitation:
4.5 gallons of Fast Dry Blue Green Enamel per hour
2.1 gallons of Kem Flash Green per hour

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

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PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

VI. Miscellaneous Requirements

1. In accordance with section OAC 3745-35-07, the following terms and conditions are federally enforceable: A.I., A.II., A.III., A.IV., and A.V.

McMc

PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - West dip tank paint line	Ohio's Air Toxics Policy	

2. Additional Terms and Conditions

2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

1. 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	TLV (mg/m ³)	Maximum Hourly Emission Rate (lbs/hour)	Predicted 1-Hour Maximum Ground-Level Concentration (ug/m ³)	MAGLC (ug/m ³)
Xylene	434.19	13.49	10,240	10,388
Ethylbenzene	434.19	0.4	301.1	10,388

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Methyl Isobutyl Ketone	204.83	5.48	4,155	4,876.8
VM &P Naphtha	1,399	13.49	10,240	33,304

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install 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

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McMc

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: K002

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

McMc
PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Big Dip Tank Paint Line	OAC rule 3745-31-02 (A)(2)	VOC - 7.71 lbs/hour and 15.43 tons per rolling 12-months
		single HAP - 1,566.7 lbs/month, facility-wide and 9.4 tons per rolling 12-months, facility-wide
		combined HAPs - 3,850 lbs/month, facility-wide and 23.1 tons per rolling 12-months, facility-wide
	OAC rule 3745-21-09 (U)(2)(f)	5.25 lbs VOC per gallon coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (A)(3)	See A.I.2.a. and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The permittee shall be restricted to the use of not more than 4.5 gallons of Fast Dry Blue Green Enamel 8121 per hour.
- 2.b The permittee shall be restricted to the use of not more than 2.1 gallons of Kem Flash Green E61GC702 per hour.

II. Operational Restrictions

Emissions Unit ID: K003

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

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	1.35	0.82	1.93
2	2.63	1.60	3.85
3	3.91	2.38	5.77
4	5.19	3.16	7.69
5	6.47	3.94	9.61
6	7.75	4.72	11.53
7	9.03	5.50	13.45
8	10.31	6.28	15.37
9	11.59	7.06	17.29
10	12.87	7.84	19.21
11	14.15	8.62	21.13
12	15.43	9.40	23.10

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 15.43 tons VOC
Tons single HAP emissions current month	+	Previous 11 months single HAP	Total 12-month < or = 9.4 tons single HAP
Tons combined HAPs emissions current month	+	Previous 11 months tons combined HAPs	Total 12-month < or = 23.1 tons combined HAPs

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line.
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information for each day for the coating operation.
 - a. The company identification for each coating cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.

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- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., $b \times c$).
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials (i.e., $(d)/(e)$, in pounds per hour (average)).
3. The permittee shall collect and record the following information each month.
- a. The name and identification number of each coating, as applied.
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f).
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period

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(for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material).

- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

4. The permittee shall continue to research potential "lower solvent" coatings for implementation in this emissions unit. The facility shall maintain records that summarize the results of that research.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit written quarterly deviation (excursion) reports to the Director (the Ohio EPA Northeast District Office) of any record showing a deviation from the hourly and rolling 12-month VOC emissions limitations. 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 following the end of the calendar month.
3. The permittee shall submit written quarterly deviation (excursion) reports to the Director (the Ohio EPA Northeast District Office) of any record showing a deviation from the single and combined monthly and rolling 12-month HAP emissions limitations. 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 following the end of the calendar month.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance.

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Facility ID: 0285010336

Emissions Unit ID: K003

4. The permittee shall submit annual reports that detail the results of the research concerning the use of "lower solvent" VOC coatings in this emissions unit. Each report shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

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):

Issued: To be entered upon final issuance

Emission Limitation:
7.71 lbs VOC per hour

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

Emission Limitation:
15.43 tons VOC per rolling 12-months and the limitations established for the first 12 months of operation

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

Emission Limitation:
1,566.7 pounds per month and 9.4 tons single HAP per rolling 12-month and the limitations established for the first 12 months of operation.

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.3.

Emission Limitation:
3,850 pounds per month and 23.1 tons combined HAPs per rolling 12-months and the limitations established for the first 12 months of operation

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.3.

Emission Limitation:
5.25 lbs VOC per gallon coating

Applicable Compliance Method:
Compliance shall be determined based upon record keeping specified in A.III.1.

Emission Limitation:
4.5 gallons of Fast Dry Blue Green Enamel per hour
2.1 gallons of Kem Flash Green per hour

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

McMc

PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance

VI. Miscellaneous Requirements

1. In accordance with section OAC 3745-35-07, the following terms and conditions are federally enforceable: A.I., A.II., A.III., A.IV., and A.V.

McMc
PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Big Dip Tank Paint Line	Ohio's Air Toxics Policy	

2. Additional Terms and Conditions

2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

1. 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	TLV (mg/m3)	Maximum Hourly Emission Rate (lbs/hour)	Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	MAGLC (ug/m3)
Xylene	434.19	13.49	10,240	10,338
Ethylbenzene	434.19	0.4	301.1	10,338

McMorrow Brothers Inc
 PTI Application: 02-14247
 Issued

Facility ID: 0285010336

Emissions Unit ID: K003

Methyl Isobutyl Ketone	204.83	5.48	4,155	4,876.8
VM & P Naphtha	1,399	13.49	10,240	33,304

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

McMc

PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance

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

McMorrow Brothers Inc
PTI Application: 02-14347
Issued

Facility ID: 0285010336

Emissions Unit ID: K003

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

NEW SOURCE REVIEW FORM B

PTI Number: 02-14347 Facility ID: 0285010336

FACILITY NAME McMorrow Brothers Inc

FACILITY DESCRIPTION 3 Dip Tank Paint Lines CITY/TWP Orrville

SIC CODE 3479 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION East dip tank line

DATE INSTALLED 4/86

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	12.45 lbs/hour	24.90	12.45 lbs/hour	24.90
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?

Enter Determination 5.25 lbs VOC/gallon coating, OAC rule 3745-21-09 (U)(2)(f)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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 YES NOIDENTIFY THE AIR CONTAMINANTS: Xylene, Ethylbenzene, MIBK, VM & P Naphtha

NEW SOURCE REVIEW FORM B

PTI Number: 02-14347 Facility ID: 0285010336

FACILITY NAME McMorrow Brothers Inc

FACILITY DESCRIPTION 3 Dip Tank Paint Lines

CITY/TWP Orrville

Emissions Unit ID: K003

SIC CODE 3479

SCC CODE 4-02-001-10

EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Big Dip Tank Paint Line

DATE INSTALLED April 1986

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	7.71 lbs VOC/hour	15.43	7.71 lbs VOC/hour	15.43
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?

Enter Determination 5.25 lbs VOC/gallon coating, OAC rule 3745-21-09 (U)(2)(f)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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 YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: Xylene, Ethylbenzene, MIBK, VM & P Naphtha

4 NEW SOURCE REVIEW FORM B

PTI Number: 02-14347

Facility ID: 0285010336

FACILITY NAME McMorrow Brothers Inc

FACILITY DESCRIPTION 3 Dip Tank Paint Lines

CITY/TWP Orrville

Emissions Unit ID: K003

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'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc. (EAR)</u>	<input type="checkbox"/>	0000000t.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>

* 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 02-14347

A. Source Description

McMorrow Brothers is located at 715 Smithville Road in Orrville, Wayne County, Ohio. Wayne County is currently designated as attainment for all criteria pollutants. The facility operates under SIC code 3479 and coats miscellaneous metal.

B. Facility Emissions and Attainment Status

McMorrow Brothers operates three paint dip lines. The facility's uncontrolled potential to emit is 134.1 tons VOC per year. The facility's uncontrolled potential to emit for HAPs is 50.5 tons combined HAPs and 20.5 tons per year of a single HAP (methyl isobutyl ketone). The facility has proposed to restrict daily coating use such that the potential VOC emissions will be 61.24 tons per year, combined HAPs emissions will be 23.1 tons per year and individual HAP emissions will not be more than 9.4 tons per year (MIBK). Thus, the facility will qualify as a synthetic minor facility and will not be subject to the Title V permitting program.

C. Source Emissions

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PTI Number: 02-14347

Facility ID: 0285010336

FACILITY NAME McMorrow Brothers Inc

FACILITY DESCRIPTION 3 Dip Tank Paint Lines

CITY/TWP Orrville

Emissions Unit ID: K003

McMorrow Brothers operates three paint dip lines. K001, the east dip tank paint line, coats electric motor housings and is subject to OAC rule 3745-21-09 (U)(1)(c), 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. The line was installed in April of 1986, without first obtaining a permit to install. The line has potential uncontrolled VOC emissions of 12.45 pounds per hour and 54.53 tons per year. The facility proposes to limit coating application so as to restrict VOC emissions to 12.45 lbs per hour and 24.9 tons per year.

K002, the west dip tank paint line, coats electric motor housings and is subject to OAC rule 3745-21-09 (U)(1)(c), 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. The line was installed in April of 1986 without first obtaining a permit to install. The line has potential uncontrolled VOC emissions of 10.45 pounds per hour and 45.8 tons per year. The facility proposes to limit coating application so as to restrict VOC emissions to 10.45 pounds per hour and 20.91 tons per year.

K003, the big dip tank paint line, coats electric motor housings and is subject to OAC rule 3745-21-09 (U)(1)(c), 3.5 pounds VOC per gallon coating, excluding water and exempt solvents. The line was installed in April of 1986 without first obtaining a permit to install. The line has potential uncontrolled VOC emissions of 7.71 pounds VOC per hour and 33.8 tons per year. The facility proposes to limit coating application so as to restrict VOC emissions to 7.71 pounds per hour and 15.43 tons per year.

McMorrow Brothers has been unable to locate compliant coatings which fulfill the requirements of its customers. The facility has completed a BAT study, which concluded the addition of control equipment is not economically feasible. The facility has proposed to use coatings which will not exceed 5.25 lbs VOC per gallon, excluding water and exempt solvents, via OAC rule 3745-21-09 (U)(2)(f). Total facility VOC emissions will be restricted to 61.24 tons per year. Facility-wide combined HAP emissions will be restricted to 23.1 tons per year. Emissions of any single HAP will not exceed 9.4 tons per year.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14347

Facility ID: 0285010336

FACILITY NAME McMorrow Brothers Inc

FACILITY DESCRIPTION 3 Dip Tank Paint Lines

CITY/TWP Orrville

Emissions Unit ID: K003

D. Conclusion

This permit will restrict the potential to emit for McMorrow Brothers to less than 100 TPY of VOC, less than 10 TPY of a single HAP, and less than 25TPY of combined HAPs. Thus, this facility will not be subject to the Title V permitting requirements.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	61.24
combined HAPs	23.1
single HAP	9.4