



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-16050

DATE: 4/27/2004

DTR Industries Inc
Jonathan Zimmerman
320 Snider Rd
Bluffton, OH 45817

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 4/27/2004
Effective Date: 4/27/2004**

FINAL PERMIT TO INSTALL 03-16050

Application Number: 03-16050
APS Premise Number: 0302000166
Permit Fee: **\$400**
Name of Facility: DTR Industries Inc
Person to Contact: Jonathan Zimmerman
Address: 320 Snider Rd
Bluffton, OH 45817

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

**320 Snider Rd
Bluffton, Ohio**

Description of proposed emissions unit(s):

2 automatic adhesive spray booths.

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

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.9 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 ninety (90) 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.

12. 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.

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

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

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

4. 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.

5. 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.

6. 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.

7. 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).

8. 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.

9. 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>
OC	48.86
PE	0.52

11

DTR Industries Inc

PTI Application: **03-16050**

Issued: 4/27/2004

Facility ID: **0302000166**

12

DTR I

PTI A₁

Issued: 4/27/2004

Emissions Unit ID: K055

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

This emissions unit is subject to 40 CFR Part 63, Subpart M MMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart M MMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart M MMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart M MMM and Subpart A.

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>
	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)
K055 - Automatic adhesive spray machine no. 10 - miscellaneous metal parts coating operation	OAC rule 3745-31-05 (A)(3)
	OAC rule 3745-21-09(U)(2)(e)(iii)

40 CFR Part 63, Subpart M

OAC rule 3745-31-05 (C)

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry filtration system

coating usage for primer coating operations never exceeding 10 gallons of coating in any one day, and topcoat operations never exceeding 10 gallons of coating in any one day (See A.I.2.d)

0.06 lbs particulate emissions (PE)/hr; 0.26 ton PE/year

see section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

Visible particulate emissions shall not exceed 0% opacity as a six-minute average.

63.70 lbs organic compounds (OC)/day; 11.63 tons OC/year from primer coating operations

67.70 lbs OC/day; 12.36 tons OC/year for topcoat coating operations

73.0 lbs OC/month; 0.44 ton OC/year from cleanup materials

See A.I.2.a

255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.b. (see A.I.2.b.)

See A.I.2.c.

See A.I.2.c.

VOC emission exemption, based on maximum daily

Emissions Unit ID: K055

2. Additional Terms and Conditions

- 2.a** The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(C).
- 2.b** The emissions of OC from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055 and K056 combined shall not exceed 255 tons per year, based upon a rolling, 365-day summation of the daily emissions.
- The 255 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For the purposes of federal enforceability, OC limitations effectively restrict VOC emissions.
- Rolling emission limitations for Anti-Vibration Adhesive Coating operations were initially established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and modified in PTI #03-13938 issued on August 28, 2003, and as such, rolling OC emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** This emissions unit is exempt from the compliant coating requirements of OAC rule 3745-21-09(U)(1) provided primer coating usage never exceeds 10 gallons in any one day and topcoat coating usage never exceeds 10 gallons in any one day. If primer or topcoat coating usage exceeds 10 gallons in any one day, the emissions unit will no longer qualify for the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) and the permittee will be required to comply with the requirements of OAC rule 3745-21-09(U)(1). The requirements of OAC rule 3745-21-09(U)(1) will become applicable to this emissions unit on the day coating usage exceeds 10 gallons and will continue to be applicable even on following days where coating usage is less than 10 gallons.

II. Operational Restrictions

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for coating material usage in emissions unit K055:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all of the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all of the topcoats employed;
 - f. the organic compound (OC) content of each coating (primer and topcoat), in lbs/gallon, as applied;
 - g. the OC emission rate for each primer, in lbs/day (b x f);
 - h. the OC emissions rate for all primers, in lbs/day, (sum of g);
 - i. the OC emissions rate for each topcoat, in lbs/day (d x f);
 - j. the OC emissions rate for all topcoats, in lbs/day (sum of i);
 - k. the total OC emission rate for all coatings (primers and topcoats), in lbs/day (sum of h and J).
3. The permittee shall collect and maintain daily records of the following information for the clean-up operations:

- a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC input rate for clean-up material, (b x c), in lbs per day;
 - e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of (d).
4. In order to demonstrate compliance with the 255 tons per rolling 365-day period, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055 and K056 combined.
- a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rates from each coating and cleanup material employed (b x c); and
 - e. the total OC emission rate from all coatings and cleanup material employed, (summation of A.III.2.k and A.III.3.d); and
 - f. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or 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 appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K055 which identify exceedances of any of the following:

- a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
- b. any exceedances of the 63.70 lbs OC/day from primer coating operations;;
- c. any exceedances of the 67.70 lbs OC/day from topcoat coating operations;
- d. any exceedances of the 73.0 lbs OC/month from cleanup material limitation; and
- e. any exceedances of the 255 tons OC per rolling, 12-month period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K034, K043, K046, K048, K055 and K056 combined.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
63.70 lbs OC/day from primer coating operations

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping established in A.III.2.h.
 - b. **Emission Limitation**
11.63 tons OC/year from primer coating operations

Applicable Compliance Method
The annual emission limitation was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.
 - c. **Emission Limitation**
67.70 lbs OC/day from topcoat operations

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping established in A.III.2.j.
 - d. **Emission Limitation**
12.36 tons OC/year from topcoat operations

Applicable Compliance Method

The annual emission limitation was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.

e. **Emission Limitation**

73.0 lbs OC/month, 0.44 ton OC/year from cleanup operations

Applicable Compliance Method

Compliance with this monthly limitation shall be determined by the monitoring and recordkeeping in section A.III.3 of this permit. The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is shown with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

f. **Emission Limitation**

0.06 lb PE/hour, 0.26 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

g. **Emission Limitation**

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Emissions Unit ID: K055

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

h. Emission Limitation

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 K048, K055 and K056 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by monitoring and recordkeeping in section A.III.4. of this permit.

i. Emission Limitation

VOC emission exemption, based on maximum daily coating usage for primer coating operations and topcoat operations, separately, not exceeding 10 gallons of coating in any one day

21

DTR I

PTI A₁

Issued: 4/27/2004

Emissions Unit ID: K055

Applicable Compliance Method

Compliance with this limitation shall be determined by monitoring and recordkeeping in section A.III.2. of this permit.

VI. Miscellaneous Requirements

None

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>
K055 - Automatic adhesive spray machine no. 10 - miscellaneous metal parts coating operation	See B.III.1	See B.III.1

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K055 and K056 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
 TLV (mg/m³): 204.82

23

DTR I

PTI A₁

Issued: 4/27/2004

Emissions Unit ID: K055

Maximum Hourly Emission Rate (lbs/hr): 7.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 967.3
MAGLC (ug/m³): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 7.52*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1010
MAGLC (ug/m³): 4486

*Combined emission rate for K055 and K056.

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 compositions 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.).
2. 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 evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

Emissions Unit ID: K055

- 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

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>	
K056 - Automatic adhesive spray machine no. 11 - miscellaneous metal parts coating operation	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
		OAC rule 3745-21-09(U)(2)(e)(iii)
	OAC rule 3745-31-05 (C)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry filtration system

0.06 lbs particulate emissions (PE)/hr; 0.26 ton PE/year

Visible particulate emissions shall not exceed 0% opacity as a six-minute average.

63.70 lbs organic compounds (OC)/day; 11.63 tons OC/year from primer coating operations

67.70 lbs OC/day; 12.36 tons OC/year for topcoat coating operations

73.0 lbs OC/month; 0.44 ton OC/year from cleanup materials

See A.I.2.a

255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.b. (see A.I.2.b.)

See A.I.2.c.

See A.I.2.c.

VOC emission exemption, based on maximum daily

coating usage for primer coating operations never exceeding 10 gallons of coating in any one day, and topcoat operations never exceeding 10 gallons of coating in any one day (See A.I.2.d)

2. Additional Terms and Conditions

- 2.a** The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(C).
- 2.b** The emissions of OC from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055 and K056 combined shall not exceed 255 tons per year, based upon a rolling, 365-day summation of the daily emissions.

The 255 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For the purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

Rolling emission limitations for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** This emissions unit is exempt from the compliant coating requirements of OAC rule 3745-21-09(U)(1) provided primer coating usage never exceeds 10 gallons in any one day and topcoat coating usage never exceeds 10 gallons in any one day. If primer or topcoat coating usage exceeds 10 gallons in any one day, the emissions unit will no longer qualify for the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) and the permittee will be required to comply with the requirements of OAC rule 3745-21-09(U)(1). The requirements of OAC rule 3745-21-09(U)(1) will become applicable to this emissions unit on the day coating usage exceeds 10 gallons and will continue to be applicable even on following days where coating usage is less than 10 gallons.

II. Operational Restrictions

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for coating material usage in emissions unit K056:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all of the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all of the topcoats employed;
 - f. the organic compound (OC) content of each coating (primer and topcoat), in lbs/gallon, as applied;
 - g. the OC emission rate for each primer, in lbs/day (b x f);
 - h. the OC emissions rate for all primers, in lbs/day, (sum of g);
 - i. the OC emissions rate for each topcoat, in lbs/day (d x f);
 - j. the OC emissions rate for all topcoats, in lbs/day, (sum of i);
 - k. the total OC emission rate for all coatings (primers and topcoats), in lbs/day (sum of h and j).
3. The permittee shall collect and maintain daily records of the following information for the clean-up operations:
 - a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC input rate for clean-up material, (b x c), in lbs per day;
 - e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of (d).

4. In order to demonstrate compliance with the 255 tons per rolling 365-day period, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055 and K056 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rates from each coating and cleanup material employed (b x c); and
 - e. the total OC emission rate from all coatings and cleanup material employed, (summation of A.III.2.k and A.III.3.d); and
 - f. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or 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 appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K056 which identify exceedances of any of the following:
 - a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
 - b. any exceedances of the 63.70 lbs OC/day from primer coating operations;
 - c. any exceedances of the 67.70 lbs OC/day from topcoat coating operations;
 - d. any exceedances of the 73.0 lbs OC/month from cleanup material limitation; and
 - e. any exceedances of the 255 tons OC per rolling, 12-month period for Anti-Vibration

Emissions Unit ID: K056

Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K034, K043, K046, K048, K055 and K056 combined.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
63.70 lbs OC/day from primer coating operations

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping established in A.III.2.h.
 - b. **Emission Limitation**
11.63 tons OC/year from primer coating operations

Applicable Compliance Method
The annual emission limitation was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.
 - c. **Emission Limitation**
67.70 lbs OC/day from topcoat operations

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping established in A.III.2.j.
 - d. **Emission Limitation**
12.36 tons OC/year from topcoat operations

Applicable Compliance Method
The annual emission limitation was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.
 - e. **Emission Limitation**
73.0 lbs OC/month, 0.44 ton OC/year from cleanup operations

Applicable Compliance Method
Compliance with this monthly limitation shall be determined by the monitoring and recordkeeping in section A.III.3 of this permit. The annual limitation was established by

multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is shown with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

- f. **Emission Limitation**
0.06 lb PE/hour, 0.26 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/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

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- g. **Emission Limitation**
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- h. **Emission Limitation**
255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 K048, K055 and K056 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by monitoring and recordkeeping in section A.III.4. of this permit.

- i. **Emission Limitation**
VOC emission exemption, based on maximum daily coating usage for primer coating operations and topcoat operations, separately, not exceeding 10 gallons of coating in any one day

DTR Industries Inc
PTI Application: 02 16050
Issued

Facility ID: 0302000166

Emissions Unit ID: K056

Applicable Compliance Method

Compliance with this limitation shall be determined by monitoring and recordkeeping in section A.III.2. of this permit.

35

DTR I

PTI A₁

Issued: 4/27/2004

Emissions Unit ID: K056

VI. Miscellaneous Requirements

None

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>
K056 - Automatic adhesive spray machine no. 11 - miscellaneous metal parts coating operation	See B.III.1	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K055 and K056 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone

TLV (mg/m³): 204.82

37

DTR I

PTI A₁

Issued: 4/27/2004

Emissions Unit ID: K056

Maximum Hourly Emission Rate (lbs/hr): 7.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 967.3
MAGLC (ug/m³): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 7.52*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1010
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*Combined emission rate for K055 and K056.

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 compositions 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.).
2. 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 evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

Emissions Unit ID: K056

- 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