



Street Address:

State of Ohio Environmental Protection Agency
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY
Application No: 03-13379**

CERTIFIED MAIL

DATE: 10/17/2000

Metal Coating Co
Gary Clay
1700 Elida Rd
Lima, OH 45805

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 Director's 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: October 17, 2000
Effective Date: October 17, 2000**

FINAL PERMIT TO INSTALL 03-13379

Application Number: 03-13379
APS Premise Number: 0302020333
Permit Fee: **\$400**
Name of Facility: Metal Coating Co
Person to Contact: Gary Clay
Address: 1700 Elida Rd
Lima, OH 45805

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

**1700 Elida Rd
Lima, Ohio**

Description of proposed emissions unit(s):

New installation of a vapor degreaser employing a MACT solvent.

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

Metal Coating Co
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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements 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 information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	3.32

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Facility ID: 0302020333

Emissions Unit ID: L001

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L001 - Batch open top vapor degreaser (trichlorethylene)	OAC rule 3745-31-05(A)(3)	3.32 TPY OC
		See A.2.a
	40 CFR Part 63, Subpart T	30.7 lbs OC/ft ² /month (553 lbs OC/month) based upon a rolling 3-month average
	OAC rule 3745-21-09(O)	See A.2.b

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
- 2.b The requirements of this rule are less stringent than the requirements established pursuant to 40 CFR Part 63, Subpart T and OAC rule 3745-31-05(A)(3).
- 2.c The permittee shall demonstrate compliance with the applicable 3-month rolling average monthly emission limit on a monthly basis as described in 63.465(b) and (c). If the applicable 3-month rolling average emission limit is not met, an exceedance has occurred. All exceedances shall be reported as required in 63.468(h) of subpart T.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records, in written or electronic form, of the following for a period of **five years**:
 - a. The dates and amounts of solvent added to the solvent cleaning machine.
 - b. The solvent composition of wastes removed from cleaning machines as determined using the procedure in 63.465(c)(2).
 - c. Calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations.
 - d. The permittee shall maintain a log of solvent additions and deletions for emissions unit L001, and ensure that the emissions are equal to or less than the 30.7 lbs OC/ft²/rolling 3-month period, using the procedures in § 63.465(b) and (c).

2. The permittee, on the first operating day of every month, shall:
 - a. Ensure that the solvent cleaning machine system contains only clean solvent which may be recycled or used solvent that has been cleaned of soils.

A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in 63.465(c). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
 - b. Using the records of all solvent additions and deletions for the previous monthly reporting period required under 63.464(a), determine solvent emissions (E_I) using equation 2 for cleaning machines with a solvent/air interface. Equation 2 can be found in 63.465 subpart T.
 - c. Determine the monthly rolling average, EA, for the 3-month period ending with the most recent reporting period using equation 4 for cleaning machines with a solvent/air

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Emissions Unit ID: **L001**

interface. Equation 4 can be found in 63.465.

D. Reporting Requirements

1. The permittee shall submit an initial notification report to the Administrator using the one of the following applicable criteria:
 - a. New sources for which construction or reconstruction had commenced and initial startup had not occurred before 12/2/94, shall submit the report as soon as practicable before startup but no later than 1/31/95.
 - b. New sources for which construction or reconstruction commenced after 12/2/94 shall submit the report as soon as practicable before the construction or reconstruction is planned to commence.

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Emissions Unit ID: **L001**

2. The Initial Notification Report shall include all the information required in 63.5(d)(1) of subpart A with the following revisions and additions:
 - a. A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
 - b. The anticipated compliance approach for each solvent cleaning machine.
 - c. In lieu of 63.5(d)(1)(ii)(H) of subpart A, the facility shall report an estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
3. This facility shall submit, to the Administrator, an initial statement of compliance for each solvent cleaning machine using one of the following applicable criteria:
 - a. For existing sources, this report shall be submitted to the Administrator no later than 150 days after the compliance date of 63.460(d).
 - b. For new sources, this report shall be submitted to the Administrator no later than 150 days after startup or 5/1/95 whichever is later.
4. The statement of compliance shall include the following information:
 - a. The name and address of the owner or operator.
 - b. The address of the cleaning machine(s).
 - c. The solvent/air interface area for each solvent cleaning machine or, for cleaning machines without solvent/air interface, a description of the method used to determine the cleaning capacity and the results.
 - d. The results of the first 3-month average emissions calculations.
5. This facility shall submit a solvent emission report every year which shall contain the following:
 - a. The size and type of each unit subject to subpart T (solvent/air interface area or cleaning capacity).
 - b. The average monthly solvent consumption for the solvent cleaning machine in kilograms per month.
 - c. The 3-month rolling average emissions estimates calculated each month using the method

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described in 63.465(c).

Emissions Unit ID: **L001**

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6. This facility shall submit an exceedance to the Administrator semiannually except when the Administrator determines on a case-by-case basis that more frequent reporting is necessary. Once the exceedance has occurred, a quarterly reporting format shall be followed until a request to reduce reporting frequency is approved.

Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The report shall include the applicable information as follows:

- a. Information on the actions taken to comply with 63.463(e)&(f). This information shall include records of written or verbal orders of replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- b. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- c. If no exceedances have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

E. Testing Requirements

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

- a. Emission Limitation
30.7 lbs OC/ft²/month (553 lbs OC/month) based upon a 3-month rolling average

Applicable Compliance Method

The permittee shall demonstrate compliance with the applicable 3-month rolling average monthly emission limit on a monthly basis as described in 63.465(b) and (c).

- b. Emission Limitation:
3.32 tons OC/yr

Applicable Compliance Method:

The emission limitation was developed by multiplying the 30.7 lbs OC/ft²/month limitation from 40 CFR Part 63, Subpart T, the solvent/air interface area of 18 ft² and a maximum operating schedule of 12 months per year and dividing by 2000 lbs per ton. Therefore,

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provided compliance is shown with the lbs OC/ft²/month requirement, compliance will be shown with the annual limitation.

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F. Miscellaneous Requirements

1. This facility shall determine the potential to emit for all solvent cleaning operations using the procedures described in 63.465 (e)(1) through (e)(3). The facility's total potential to emit shall be the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other sources within the facility.

NEW SOURCE REVIEW FORM B

PTI Number: 03-13379 Facility ID: 0302020333

FACILITY NAME Metal Coating Company

FACILITY DESCRIPTION New installation of a vapor degreaser employing a MACT solvent CITY/TWP Lima

SIC CODE 3479 SCC CODE 3-09-001-99 EMISSIONS UNIT ID L001

EMISSIONS UNIT DESCRIPTION Batch Open Top Vapor Degreaser

DATE INSTALLED 9/15/94

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		0.53 TPY		3.32 TPY
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

MACT? **Subpart T** NESHAP? PSD? OFFSET POLICY?

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

Enter Determination Use of open-top degreaser cover, reduced room draft, 125% freeboard ratio, freeboard refrigeration device, and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: n/a

NEW SOURCE REVIEW FORM B

PTI Number: Facility ID: 0302020333

03-13379

FACILITY NAME Metal Coating Company

FACILITY DESCRIPTION New installation of a vapor degreaser employing a MACT solvent CITY/TWP Lima

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

Please fill out the following. If the checkbox does not work, replace it with an 'X'

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

See permit review forms (calculations)

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

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

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>
OC	3.32

NEW SOURCE REVIEW FORM B

PTI Number:

Facility ID: 0302020333

03-13379

FACILITY NAME Metal Coating Company

FACILITY DESCRIPTION	New installation of a vapor degreaser employing a MACT solvent	CITY/TWP	Lima
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