



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
ASHLAND COUNTY
Application No: 03-13719**

CERTIFIED MAIL

DATE: 11/7/2002

F. E. Myers
Keith Yeater
1101 Myers Parkway
Ashland, OH 44805

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 100** 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,

Michael W. Ahern, Supervisor
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: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-13719

Application Number: 03-13719
APS Premise Number: 0303010175
Permit Fee: **To be entered upon final issuance**
Name of Facility: F. E. Myers
Person to Contact: Keith Yeater
Address: 1101 Myers Parkway
Ashland, OH 44805

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1101 Myers Parkway
Ashland, Ohio**

Description of proposed emissions unit(s):
Miscellaneous metal parts spray booth/dip tank with dry filtration, 4.0 mmBtu/hr NG fired power washer, 2.0 mmBtu/hr NG dry-off oven, 0.48 mmBtu/hr NG infrared oven, and 3.0 mmBtu/hr NG cure oven.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

F. E. Myers

Facility ID: 0303010175

PTI Application: 03-13719

Issued: To be entered upon final issuance

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

F. E. Myers

Facility ID: 0303010175

PTI Application: 03-13719

Issued: To be entered upon final issuance

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

5

F. E. Myers

PTI Application: 03-13719

Issued: To be entered upon final issuance

lead to such sanctions

Facility ID: 0303010175

F. E. Myers

Facility ID: 0303010175

PTI Application: 03-13719

Issued: To be entered upon final issuance

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate 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

- 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

F. E. Myers

Facility ID: 0303010175

PTI Application: 03-13719

Issued: To be entered upon final issuance

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..

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	13.63
Individual HAP's	< 10.00

8

F. E. Myers

PTI Application: 03-13719

Issued: To be entered upon final issuance

Facility ID: 0303010175

F. E. P

PTI A

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Miscellaneous metal parts spray booth/dip tank with dry filtration, 4.0 mmBtu/hr NG fired power washer, 2.0 mmBtu/hr NG dry-off oven, 0.48 mmBtu/hr NG infrared oven, and 3.0 mmBtu/hr NG cure oven. (Administrative Modification of PTI 03-13719 previously issued on April 9, 2002 to allow for change in equipment description, and other minor administrative changes).	OAC rule 3745-31-05 (A) (3)	6.38 lbs OC/hr (see A.2.c.)
	OAC rule 3745-21-09 (U) (1) (c)	See A.2.a.
	OAC rule 3745-31-05 (D)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
		13.63 tons OC per rolling, 12-month period based on coating usage restrictions (see A.2.b.)
		Less than 10 tons per rolling, 12-month period for any individual HAP* (See A.2.b.)

* Hazardous Air Pollutant (HAP) as defined in Section 112 (b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U) (1) (c) and OAC rule 3745-31-05 (D).
- 2.b The permittee has requested federally enforceable limitations for emissions unit K004 of 13.63 tons of OC and less than 10 tons of any individual HAP per rolling, 12-month period, all based on gallon usage and coating content restrictions (see B.1. and B.2.).

F. E. 1

PTI A

Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

Federally enforceable single HAP limitations are being established for the purpose of avoiding Title V applicability. Federally enforceable OC limits are being established for purpose of limiting the potential to emit on VOC's (see B.1., B.3., and B.4.).

For purpose of federal enforceability, emission limitations on OC's will effectively restrict emissions of VOC's.

- 2.c** This emission limitation does not include OC emissions from the products of combustion associated with this line for they have been determined to be negligible. Other emission limitations associated with the products of combustion (i.e. NO_x and CO) from natural gas have not been established for this emissions unit due to insignificant levels of emissions.

B. Operational Restrictions

1. The use of organic compounds as defined in OAC rule 3745-21-01 (B) (4) is prohibited for use as cleanup material in this emissions unit.
2. The maximum annual coating material usage for emissions unit K004 shall not exceed 20,500 gallons.

The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Combined Gallon Usage
1-1	1708
1-2	3416
1-3	5124
1-4	6832
1-5	8540
1-6	10,248
1-7	11,956
1-8	13,664
1-9	15,372
1-10	17,080

F. E. Myers

PTI A

Issued

Facility ID: 0303010175

Emissions Unit ID: **K004**

1-11	18,788
1-12	20,500

F. E. 1

PTI A

Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

After the first 12 calendar months of operation, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions unit K004 shall not exceed 10 tons per year for any individual HAP, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>
1	0.83
1-2	1.66
1-3	2.49
1-4	3.32
1-5	4.15
1-6	5.00
1-7	5.83
1-8	6.66
1-9	7.49
1-10	8.32
1-11	9.15
1-12	Less than 10.0

After the first 12 calendar months of operation, compliance with the annual HAP emission limitation of less than 10 tons shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line.
 - a. The company name and identification for each coating material employed.
 - b. Documentation of whether or not each cleanup material employed is an organic material.
 - c. The VOC content of each coating, excluding water and exempt solvents, in pounds per gallon.

F. E. 1**PTI A**Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

- d. The OC content of each coating, as applied, in pounds per gallon.
 - e. The number of gallons of each coating employed.
 - f. The OC emission rate for each coating, (d x e), in pounds per month.
 - g. The total OC emission rate for all coatings employed (sum of f), in pounds per month.
 - h. The annual OC emissions, in tons, for all coatings, based upon a rolling, 12-month summation of the coating usage rates.
2. In addition, to the above information, the permittee shall also record the following information for each month for emissions unit K004:
- a. For the first 12 months of operation:
 - i. The cumulative gallon usage rate for each coating.
 - ii. The total cumulative gallon usage rate of all coatings.
 - b. After the first 12 months of operation the annual number of gallons of all coatings, based upon a rolling, 12-month summation of the coating usage rates.
- Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions unit K004:
- a. The company identification of each coating material employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate for each HAP from each coating employed (b x c).
 - e. The total emission rate for each HAP from all coatings employed, summation of (d) for each HAP in pounds per month.

F. E. 1

PTI A

Emissions Unit ID: **K004****Issued: To be entered upon final issuance**

- f. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP, in tons per month.
- g. After the first 12-months of operation under the provisions of this permit, the annual emissions of each individual HAP, based upon a rolling, 12-month summation of the individual HAP emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 4. The permit to install for emission unit K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: ethylene glycol n-butyl ether
TLV (mg/m³): 966.63
Maximum Hourly Emission Rate (lbs/hr): 4.09
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 485.9
MAGLC (ug/m³): 2301

Pollutant: n-butanol
TLV (mg/m³): 1515.75
Maximum Hourly Emission Rate (lbs/hr): 0.23
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 27.3
MAGLC (ug/m³): 3609

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:

F. E. Myers**PTI A****Issued****Facility ID: 0303010175****Emissions Unit ID: K004**

- 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.).

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.

5. 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":
 - 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.

D. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K004 which identify exceedance of any of the following:
 - a. Any exceedance of the maximum allowable gallon usage rates as specified in paragraph B.3.
 - b. Any exceedance of the maximum emission limitations for each HAP as specified in paragraph B.4.

F. E. Myers**PTI A****Issued****Facility ID: 0303010175****Emissions Unit ID: K004**

- c. Any exceedance of the 13.63 tons OC per rolling, 12 month period.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of organic materials as cleanup material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: 6.38 lbs OC/hr

Applicable Compliance Method: The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.
*The potential to emit is based on a maximum gallon usage of 4.80 gal/hr and a maximum OC content of 1.33 lbs /gallon.
 - b. Emission Limitation: 13.63 tons OC/rolling 12-month period.

Applicable Compliance Method: Compliance with this limitation shall be determined by the recordkeeping in section C.1. of this permit.
 - c. Emission Limitation: 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements specified in section C.1. of the terms and conditions of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.
 - d. Emission Limitation: Less than 10 tons per rolling, 12-month period of any individual HAP

F. E. Myers

PTI A

Issued

Facility ID: 0303010175

Emissions Unit ID: **K004**

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements specified in section C.3. of this permit.

F. Miscellaneous Requirements

The following terms and conditions are federally enforceable: A, B, C, D and E.