

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **03-16232**

A. Source Description

This permit is for a Paint Spray Room(K002). This permit is a modification of permit number 03-7954, which was issued final on December 7,1994. The purpose of this modification is to combine emissions from spray room K001 with spray room K002, due to the closing of spray room K001.

B. Facility Emissions and Attainment Status

The facility has requested synthetic minor limitations to avoid Title V and MACT applicability. The facility has requested an input restriction of a maximum of 480 railcars per year.

The facility also, requested a Hazardous Air Pollutants (HAPs) limitation of less than 10 tons per rolling, 12- month for any individual HAP and less than 25 tons per rolling, 12-month period for any combination of HAPs.

Transco Railway Products, In is located in Crawford County which is in attainment for all pollutants.

C. Source Emissions

Federally enforceable input restrictions of a maximum of 480 railcars per year included in this permit will result in a limitation of 80.0 tons of OC per year. HAP emissions will be limited by a restriction of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs.

D. Conclusion

With the input usage restrictions and the HAP limitations the facility will not be applicable to the Title V or MACT programs.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CRAWFORD COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-16232

Fac ID: 0317010035

DATE: 12/30/2004

Transco Railway Products, Inc.
Harold Fitz
820 Hopley Avenue
Bucyrus, OH 44820

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-16232

Application Number: 03-16232
Facility ID: 0317010035
Permit Fee: **To be entered upon final issuance**
Name of Facility: Transco Railway Products, Inc.
Person to Contact: Harold Fitz
Address: 820 Hopley Avenue
Bucyrus, OH 44820

Location of proposed air contaminant source(s) [emissions unit(s)]:
**820 Hopley Avenue
Bucyrus, Ohio**

Description of proposed emissions unit(s):
Modification to PTI number 037954 issued on December 7 1994 to combine activities of emission units K001 and K002 due to the closing of booth K001.

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

Transco Railway Products, Inc.

Facility ID: 0317010035

PTI Application: 03-16232

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

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

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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 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 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.

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

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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 emissions unit(s) covered by this permit.

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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	80.0
Individual HAP	9.9
Combined HAPs	24.9

Trans
PTI A

Emissions Unit ID: **K002**

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>
K002 - Paint Spray Room. Modification of PTI number 03-7954 issued on December 7, 1994, to combine the activities from emissions unit K001 to K002, increasing the allowable OC limitation in booth K002 due to the shutting down of emissions unit K001.	OAC rule 3745-31-05 (A)(3)	44.31 lbs Organic Compounds (OC)/hr (includes coating and cleanup operations) See section A.2.a
	OAC rule 3745-31-05 (C)	80.0 tons OC per rolling 12-month period (includes coating and cleanup operations) 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission unit K002 (see section A.2.c)
	OAC rule 3745-21-09 (U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U)(1)(c).
- 2.b The emissions of OC from emissions unit K002 shall not exceed 80.0 tons per year based

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on a rolling, 12-month summation of the monthly emissions. The federally enforceable OC limitation is based on an input restriction of the coating of 480 Auto Racks and Hoppers per year (See B.1.) Federally enforceable OC limitations are being established for the purpose of avoiding Title V applicability. For purposes of federal enforceability a restriction on OC emissions effectively limits VOC emissions.

- 2.c** HAP emissions from emissions unit K002 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

B. Operational Restrictions

1. The maximum annual number of Auto Racks and Hoppers, coated in emissions unit K002, shall not exceed 480 units per year, based upon a rolling 12-month summation of the number of units coated. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the rates specified below:

Month(s)	Number of Auto Racks and Hoppers Coated
1	40
1-2	80
1-3	120
1-4	160
1-5	200
1-6	240
1-7	280
1-8	320
1-9	360
1-10	400
1-11	440
1-12	480

After the first 12 calendar months of operation, compliance with the annual number of units coated shall be based upon a rolling, 12-month summation of the monthly of the number of units coated.

2. HAP emissions from emissions unit K002 shall not exceed 9.9 tons of any individual HAP and 24.9 tons for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

Federally enforceable HAP limitations are being established for purposes of avoiding Title V applicability.

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)

Month(s)	Individual HAP	Combined HAPs
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations 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 emissions unit K002:
 - a. the company name and identification for each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied, in lbs/gallon;
 - c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating and cleanup material employed;

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- e. the OC emission rate for each coating and cleanup material employed, in lbs ("b" x "d");
 - f. the total OC emission rate for all coatings and cleanup material (summation of "e" for all coatings and cleanup material);
 - g. for the first 12 months of operation, the cumulative monthly OC emission rate for all coatings and cleanup material; and
 - h. the rolling, 12-month summation of the total OC emission rate, in tons.
- * The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal
- OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density.
2. The permittee shall collect and record the following information each month for emissions unit K002:
 - a. the number of auto racks and hoppers coated each month;
 - b. for first 12 calendar months of operation following the issuance of this permit, the cumulative number of auto cars and hoppers coated;
 - c. after the first 12 months of operation following the issuance of this permit, the annual number of auto racks and hoppers coated, based upon a rolling 12-month summation.
 3. The permittee shall collect and record the following information regarding HAP emissions each month for emission unit K002:
 - a. the company identification of each coating and cleanup material employed;
 - b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate ("b" x "c") for each individual coating/cleanup material], in lbs/month;

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Emissions Unit ID: **K002**

- e. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, (sum of "d" for all HAPs) in lbs/month;
- f. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- g. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions unit K002 which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable number of auto racks and hoppers coated as specified in paragraph B.1. of this permit;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph A.2.c. of this permit;
 - c. any exceedances of the 80.0 tons including (coating and cleanup materials) OC per rolling, 12-month period.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

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.

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:
44.31 lbs OC/hr

Applicable Compliance Method:

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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 for this emissions unit was based on a maximum hourly coating usage of 12.66 gallons and a maximum OC content of 3.5 pounds per gallon.

- b. Emission Limitation:
80.0 tons of OC/year (including coating and cleanup operations)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in C.1.

- c. Emission Limitation:
9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs for emissions unit K002.

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements as specified in C.3.

- d. Emission Limitation:
The maximum annual number of Auto Racks and Hoppers, coated in emissions unit K002, shall not exceed 480 units per rolling 12-month period.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in C.2.

F. Miscellaneous Requirements

1. Pursuant to Engineering guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the modification resulted in an annual emissions increase of less than 1 ton for each toxic compound. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The following terms and conditions are federally enforceable: A.1, A.2.b, A.2.c, B.1, B.2, C.1, C.2, C.3, D.1, E.1.b, E.1.c., and E.1.d.