

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 03-13840

**A. Source Description**

Sandusky International, Inc. has proposed the installation of a miscellaneous metal parts fast track coating line at their facility. This emissions unit is subject to OAC rule 3745-21-09 (U) (1) (d).

**B. Facility Emissions and Attainment Status**

Currently, this facility is not a major source under Title V for volatile organic compounds (VOC's), or HAP's based on emissions from permits previously issued for emission units at the facility. Erie County is currently designated attainment for all criteria pollutants.

**C. Source Emissions**

POTENTIAL EMISSIONS: Without any restrictions, the facility has a potential to emit greater than 10 TPY of any individual hazardous air pollutant, but does not have a potential to emit greater than 100 TPY of VOC's.

RESTRICTED EMISSIONS: The facility has requested an annual gallon usage restriction of 400 gallons of primer per year and 400 gallons of topcoat per year to establish federally enforceable allowable emission limitations below Maximum Achievable Control Technology (MACT) thresholds and to limit the potential to emit VOC's to avoid future Title V applicability.

**D. Conclusion**

With a 400 gallons of primer and 400 gallons of topcoat restriction on coatings, organic hazardous air pollutants will be limited below the thresholds necessary to trigger the requirements of MACT and the potential to emit on VOC's will be limited to avoid future Title V applicability.



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  
ERIE COUNTY**

**CERTIFIED MAIL**

**Application No: 03-13840**

**DATE: 8/27/2002**

Sandusky International, Inc.  
Joel Feyedelem  
PO Box 5012 615 W Market St  
Sandusky, OH 44871-8012

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.

Very truly yours,

*Michael W. Ahern*

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

CC: USEPA

NWDO

Toledo Metro. Area Council of Gov.

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**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 03-13840**

Application Number: 03-13840  
APS Premise Number: 0322020117  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Sandusky International, Inc.  
Person to Contact: Joel Feyedelem  
Address: PO Box 5012 615 W Market St  
Sandusky, OH 44871-8012

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

**PO Box 5012  
Sandusky, Ohio**

Description of proposed emissions unit(s):

**Miscellaneous metal parts fast track coating line.**

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

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Director

**Sandusky International, Inc.**

**Facility ID: 0322020117**

**PTI Application: 03-13840**

**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

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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 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

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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 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	3.27

## 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 fast track coating line.	OAC rule 3745-31-05 (A) (3)	11.36 lbs organic compounds (OC)/hr from coating operations  357 lbs OC/month and 2.14 tons OC/yr from cleanup operations  See A.2.a.
	OAC rule 3745-21-09 (U) (1) (d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding 200 degrees Fahrenheit
	OAC rule 3745-31-05 (D)	1.13 tons OC per rolling, 12-month period based on coating usage restrictions from coating operations (see A.2.b.)

### 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) (d) and OAC rule 3745-31-05 (D).
- 2.b** The permittee has requested a federally enforceable limitation for emissions unit K001 of 1.13 tons of OC per rolling, 12-month period, from coating operations, based on coating

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usage and content restrictions (see B.1. and B.2.). Federally enforceable OC limitations are being established for the purpose of avoiding Maximum Achievable Control Technology (MACT) applicability and limiting the potential to emit organic compounds (see B.1. and B.2.).

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

The federally enforceable emission limitation of 1.13 tons OC per rolling 12-month period also limits the potential to emit for organic hazardous air pollutants from the coating operation of emissions unit K001.

**B. Operational Restrictions**

1. The organic compound content for coatings employed in emissions unit K001 shall not exceed 2.42 pounds per gallons for priming operations and 3.26 pounds per gallon for topcoat operations.
2. The maximum annual coating material usage for emissions unit K001 shall not exceed 400 gallons of primer and 400 gallons of topcoat.

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

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)**

<b>Month(s)</b>	<b>Total Gallon Usage (Primer)</b>	<b>Total Gallon Usage (Topcoat)</b>
1-1	100	100
1-2	127	127
1-3	154	154
1-4	181	181
1-5	208	208
1-6	235	235
1-7	262	262
1-8	289	289
1-9	316	316

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1-10	343	343
1-11	370	370
1-12	400	400

After the first 12 calendar months of operation, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage 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. the VOC content of each coating, excluding water and exempt solvents, in pounds per gallon;
  - c. the OC content of each coating, as applied, in pounds per gallon;
  - d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c x d), in pounds per month;
  - f. the total OC emission rate for all coatings employed, (sum of e), in pounds per month; and
  - g. 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 K001:
  - a. For the first 12 months of operation:
    - i. the cumulative gallon usage rate for each primer employed;
    - ii. the total cumulative gallon usage rate for all primers employed;
    - iii. the cumulative gallon usage rate for each topcoat employed; and
    - iv. the total cumulative gallon usage rate for all topcoats employed.
  
  - b. After the first 12 months of operation the annual number of gallons of all primers

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employed, based upon a rolling, 12-month summation of the primer usage rate; and

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- c. After the first 12 months of operation the annual number of gallons of all topcoats employed, based upon a rolling, 12-month summation of the topcoat usage rate.

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 each month for cleanup operations:
  - a. the company name and identification for each cleanup material employed;
  - b. the OC content, in pounds per gallon, for each cleanup material employed;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC emission rate\* for each cleanup material employed (b x c), in pounds per month;

\*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 materials used \* solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] \* solvent density).

- e. the total OC emission rate for all cleanup materials employed, (sum of d); and
- f. the annual year to date organic compound emissions, in tons, from all cleanup materials employed (sum of (e) for each calendar month to date from January to December)

**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 K001 which identify exceedance of any of the following:
  - a. any exceedance of the maximum allowable gallon usage rates specified in paragraph B.2.;
  - b. any exceedance of the organic compound content restrictions in section B.1. of this permit;

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- c. any exceedance of the 1.13 tons OC per rolling, 12-month period; and
- d. any exceedance from the monthly cleanup material emission limitation in section A.1. of this permit.

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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 submit annual written reports of any deviations (excursions) from the annual cleanup material emission limitation in section A.1. of this permit. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually by January 31 of each year and shall cover the previous calendar year.

**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: 11.36 lbs OC/hr from the coating operation  
  
Applicable Compliance Method: The hourly OC emission limitation is based on the emission units 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 primer usage of 2 gal/hr at a maximum OC content of 2.42 lbs/gallon and a maximum topcoat usage of 2 gal/hr at a maximum OC content of 3.26 lbs/gallon.
  - b. Emission Limitation: 1.13 tons OC/rolling 12-month period from the coating operation  
  
Applicable Compliance Method: Compliance with this limitation shall be determined by recordkeeping in section C.1. of this permit.
  - c. Emission Limitation: 357 lbs OC/month and 2.14 tons OC/yr from cleanup operations  
  
Applicable Compliance Method: Compliance with these limitations shall be determined by the recordkeeping in section C.2. of this permit.
  - d. Emission Limitation: 3.5 pounds of VOC per gallon, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding 200 degrees Fahrenheit

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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.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 cause the emissions of any pollutant that has a listed TLV to increase 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: Part II. A, B, C, D and E.