



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-16022**

**DATE:** 4/22/2004

American Quality Stripping  
Tim Finneran  
1750 Fifth Street  
Sandusky, OH 44870

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

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

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

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

Sincerely,

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

cc: USEPA

NWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 4/22/2004  
Effective Date: 4/22/2004**

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**FINAL PERMIT TO INSTALL 03-16022**

Application Number: 03-16022  
APS Premise Number: 0322020253  
Permit Fee: **\$2800**  
Name of Facility: American Quality Stripping  
Person to Contact: Tim Finneran  
Address: 1750 Fifth Street  
Sandusky, OH 44870

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1750 Fifth Street  
Sandusky, Ohio**

Description of proposed emissions unit(s):  
**2 hot chemical tanks and 2 metal parts burn-off ovens.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. 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 record keeping 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 record keeping 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 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 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

**American Quality Stripping**  
**PTI Application: 03-16022**  
**Issued: 4/22/2004**

**Facility ID: 0322020253**

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 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>
PE	0.18
OC	6.14

**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>
N004 - 3750 lb/hr, natural gas-fired burn-off oven with afterburner.	OAC rule 3745-31-05(A)(3)	0.02 lb particulate emissions (PE)/hr 0.09 ton PE/yr
		Opacity Restrictions (see A.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07 (A)	See A.I.2.c.
	OAC rule 3745-17-09 (B)	See A.I.2.c
	OAC rule 3745-23-06 (B)	See A.I.2.d.
	OAC rule 3745-21-08 (B)	See A.I.2.d

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60 minute period during which opacity shall not exceed 10%.
- 2.b Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of natural gas and afterburner. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## **B. Operational Restrictions**

1. The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.
2. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
  - a. The secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1500 degrees Fahrenheit, taking into account normal start-up procedures.
  - b. The secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1500 degrees Fahrenheit, taking into account normal start-up procedures.
3. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:
  - a. The permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
  - b. Prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle;

Emissions Unit ID: N004

- c. The permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
- d. The permittee shall not process organic coatings or plastics which contain halogens (such as chlorine, fluorine, sulfur, or bromine), plastics polymers or other organic materials which emit significant amounts of volatile, flammable vapors at room temperature or at temperatures up to about 500 degrees Fahrenheit, parts which may contain large amounts of volatile solvents, and non-conventional hydrocarbon coatings (polymer coatings, paint/powder coatings, oil/grease coatings). Wet paint, paint sludge, waste powder from powder coating operations, paint filters, nitrocellulose paints, solvents, thinners, waste plastic or polymer, PVC (polyvinyl chloride), lead, rubber-coated material, wood, paper, trash, waste oil, waste grease, oil filters ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR, Part 261, Subpart D are also prohibited from being burned in this furnace. In addition, coatings that contain chlorine (PVC), fluorine (Teflon), sulfur, bromine, or elements other than carbon, hydrogen, and oxygen shall not be burned in this furnace, as they may form dangerous, toxic, and corrosive acids.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
2. The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:
  - a. The dates the emissions unit was operated
  - b. The number of batches processed for each date the emissions unit was operated; and
  - c. The dates and descriptions of any additional maintenance activities performed on this emissions unit.

### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:
  - a. The date of the excursion;

- b. The temperature values during the excursion;
- c. The cause(s) for the excursion; and
- d. The corrective action which has been or will be taken to prevent similar excursions in the future.

## E. Testing Requirements

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

- a. Emission Limitations:  
0.02 lb PE/hr and 0.09 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation is based on the emission testing (performed 11-92) of a similar unit (11-92). If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual limit was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr operations and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation. Compliance will also be shown with the annual limitation.

- b. Emission Limitation:  
Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60 minute period during which opacity shall not exceed 10%.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with the test methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

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**PTI A**

**Issued: 4/22/2004**

Emissions Unit ID: **N004**

**F. Miscellaneous Requirements**

None

**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>
N005 - 3750 lb/hr, natural gas-fired burn-off oven with afterburner.	OAC rule 3745-31-05(A)(3)	0.02 lb particulate emissions (PE)/hr 0.09 ton PE/yr
		Opacity Restrictions (see A.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07 (A)	See A.I.2.c.
	OAC rule 3745-17-09 (B)	See A.I.2.c
	OAC rule 3745-23-06 (B)	See A.I.2.d.
	OAC rule 3745-21-08 (B)	See A.I.2.d

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60 minute period during which opacity shall not exceed 10%.
- 2.b Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of natural gas and afterburner. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## **B. Operational Restrictions**

1. The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.
2. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
  - a. The secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1500 degrees Fahrenheit, taking into account normal start-up procedures.
  - b. The secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1500 degrees Fahrenheit, taking into account normal start-up procedures.
3. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:
  - a. The permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
  - b. Prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle;

- c. The permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
- d. The permittee shall not process organic coatings or plastics which contain halogens (such as chlorine, fluorine, sulfur, or bromine), plastics polymers or other organic materials which emit significant amounts of volatile, flammable vapors at room temperature or at temperatures up to about 500 degrees Fahrenheit, parts which may contain large amounts of volatile solvents, and non-conventional hydrocarbon coatings (polymer coatings, paint/powder coatings, oil/grease coatings). Wet paint, paint sludge, waste powder from powder coating operations, paint filters, nitrocellulose paints, solvents, thinners, waste plastic or polymer, PVC (polyvinyl chloride), lead, rubber-coated material, wood, paper, trash, waste oil, waste grease, oil filters ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR, Part 261, Subpart D are also prohibited from being burned in this furnace. In addition, coatings that contain chlorine (PVC), fluorine (Teflon), sulfur, bromine, or elements other than carbon, hydrogen, and oxygen shall not be burned in this furnace, as they may form dangerous, toxic, and corrosive acids.

### **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
2. The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:
  - a. The dates the emissions unit was operated
  - b. The number of batches processed for each date the emissions unit was operated; and
  - c. The dates and descriptions of any additional maintenance activities performed on this emissions unit.

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:

- a. The date of the excursion;
- b. The temperature values during the excursion;
- c. The cause(s) for the excursion; and
- d. The corrective action which has been or will be taken to prevent similar excursions in the future.

## E. Testing Requirements

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

- a. Emission Limitations:  
0.02 lb PE/hr and 0.09 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation is based on the emission testing (performed 11-92) of a similar unit (11-92). If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual limit was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr operations and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation. Compliance will also be shown with the annual limitation.

- b. Emission Limitation:  
Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60 minute period during which opacity shall not exceed 10%.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with the test methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

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**PTI A**

**Issued: 4/22/2004**

Emissions Unit ID: **N005**

**F. Miscellaneous Requirements**

None

**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>
P004 - hot chemical tank for stripping soft metals of e-coat and powder coat paints	OAC rule 3745-31-05(A)(3)	0.70 lb organic compounds (OC)/hr; 3.07 tons OC/yr
	OAC rule 3745-21-07(G)(2)	None. (See B.1.)

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information for each month for the chemical paint removal operation:
  - a. The company identification for each paint removing compound employed.
  - b. Documentation of whether or not the paint removing compound is photochemically reactive as defined in OAC rule 3745-21-01..
  - c. The number of gallons of each paint removing compound employed.

Emissions Unit ID: P004

- d. The organic compound content of each paint removing compound, in pounds per gallon.
- e. The organic compound emission rate for each paint removing compound, i.e., (c) x (d), in pounds per month.
- f. The total organic compound emission rate for all paint removing compounds, i.e., the sum of (e) for all paint removing compounds, in pounds per month.
- g. The annual, year to date OC emissions from all paint removing compounds employed [the sum of (f) for each calendar month to date from January to December].

[Note: The paint removing compound information must be for the compounds as employed, including any thinning solvents added at the emissions unit].

#### D. Reporting Requirements

1. The permittee shall submit annual written reports of any deviation (excursion) from the annual paint removing compound emissions limitation in section A.1. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC 3745-15-06).
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

#### E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of this permit to install shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.70 lbs OC/hr

Applicable Compliance Method: The hourly OC emission limitation is based on the emission units potential to emit\*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

- \* The potential to emit for this emissions unit was based on a maximum OC content of 8.34 lbs per gallon and a maximum hourly usage rate of 0.084 gallons per hour.

- b. Emission Limitation: 3.07 tons OC/year

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

**F. Miscellaneous Requirements**

None

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

### A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P005 - hot chemical tank for stripping soft metals of e-coat and powder coat paints	OAC rule 3745-31-05(A)(3)	0.70 lb organic compounds (OC)/hr; 3.07 tons OC/yr
	OAC rule 3745-21-07(G)(2)	None. (See B.1.)

### 2. Additional Terms and Conditions

- None

### B. Operational Restrictions

- The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01.

### C. Monitoring and/or Record keeping Requirements

- The permittee shall collect and record the following information for each month for the chemical paint removal operation:
  - The company identification for each paint removing compound employed.
  - Documentation of whether or not the paint removing compound is photochemically reactive as defined in OAC rule 3745-21-01.
  - The number of gallons of each paint removing compound employed.

Emissions Unit ID: **P005**

- d. The organic compound content of each paint removing compound, in pounds per gallon.
- e. The organic compound emission rate for each paint removing compound, i.e., (c) x (d), in pounds per month.
- f. The total organic compound emission rate for all paint removing compounds, i.e., the sum of (e) for all paint removing compounds, in pounds per month.
- g. The annual, year to date OC emissions from all paint removing compounds employed [the sum of (f) for each calendar month to date from January to December].

[Note: The paint removing compound information must be for the compounds as employed, including any thinning solvents added at the emissions unit].

#### **D. Reporting Requirements**

1. The permittee shall submit annual written reports of any deviation (excursion) from the annual paint removing compound emissions limitation in section A.1. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC 3745-15-06).
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

#### **E. Testing Requirements**

1. Compliance with the emissions limitations in section A.1. of this permit to install shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.70 lb OC/hr

Applicable Compliance Method: The hourly OC emission limitation is based on the emission units potential to emit\*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

- \* The potential to emit for this emissions unit was based on a maximum OC content of 8.34 lbs per gallon and a maximum hourly usage rate of 0.084 gallons per hour.

If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-4, 18, 25, or 25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation: 3.07 tons OC/year

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-16022 Facility ID: 0322020253

FACILITY NAME American Quality Stripping

FACILITY DESCRIPTION 2 hot chemical tanks and 2 metal parts burn- CITY/TWP Sandusky

Emissions Unit ID: P005

SIC CODE 3999 SCC CODE 5-03-001-01 EMISSIONS UNIT ID N004

EMISSIONS UNIT DESCRIPTION 3750 lbs/hr, natural gas burn-off oven with afterburner.

DATE INSTALLED July 1996

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	attainment	0.02 lb PE/hr	0.09 ton PE/yr	0.02 lb PE/hr	0.09 ton PE/yr
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? N NESHAP? N PSD? N OFFSET POLICY? N

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

**Enter Determination** BAT for this emissions unit has been determined to be the use of natural gas, the use of an afterburner, 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? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants 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: PE

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-16022

Facility ID: 0322020253

FACILITY NAME American Quality Stripping

FACILITY DESCRIPTION 2 hot chemical tanks and 2 metal parts burn- CITY/TWP Sandusky

Emissions Unit ID: P005

SIC CODE 3999

SCC CODE 5-03-001-01

EMISSIONS UNIT ID N005

EMISSIONS UNIT DESCRIPTION 3750 lbs/hr, natural gas fired burn-off oven with afterburner.

DATE INSTALLED August 1994

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	attainment	0.02 lb PE/hr	0.09 ton PE/yr	0.02 lb PE/hr	0.09 ton PE/yr
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? N

NESHAP? N

PSD? N

OFFSET POLICY? N

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

**Enter Determination** BAT for this emissions unit has been determined to be the use of natural gas, the use of an afterburner, 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? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants 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: PE

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-16022 Facility ID: 0322020253

FACILITY NAME American Quality Stripping

FACILITY DESCRIPTION 2 hot chemical tanks and 2 metal parts burn- CITY/TWP Sandusky

Emissions Unit ID: P005

SIC CODE 3999 SCC CODE 3-99-999-95 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION hot chemical tank for stripping soft metals of e-coat and powder coat paints

DATE INSTALLED June 2001

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 <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	0.70 lbs OC/hr	3.07 tons OC/yr	0.70 lbs OC/hr	3.07 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? N NESHAP? N PSD? N OFFSET POLICY? N

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

**Enter Determination** BAT has been determined to be use of non-photochemically reactive materials and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y - see permit review form

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

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants 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: OC

26 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P005**

FACILITY DESCRIPTION 2 hot chemical tanks and 2 metal parts burn-off ovens. CITY/TWP Sandusky

SIC CODE 3999 SCC CODE 3-99-999-95 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION hot chemical tank for stripping soft metals of e-coat and powder coat paints

DATE INSTALLED August 1997

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 <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	0.7 lbs OC/hr	3.09 tons OC/yr	0.7 lbs OC/hr	3.09 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination BAT has been determined to be use of non-photochemically reactive materials and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y - see permit review form  
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**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: OC