



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**RE: PERMIT TO INSTALL FINAL  
LICKING COUNTY  
Application No: 01-7842**

**CERTIFIED MAIL****DATE:** October 27, 1999

Suburban Steel Supply Company  
Mark Debellis  
202 Township Road  
Pataskala, OH 43062

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

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

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

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style with a large, stylized initial "T".

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

cc: USEPA  
DAPC, CDO

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**Permit To Install  
Terms and Conditions**

**Issue Date: October 27, 1999  
Effective Date: October 27, 1999**

**FINAL PERMIT TO INSTALL 01-7842**

Application Number: 01-7842  
APS Premise Number: 0145000372  
Permit Fee: **\$600**  
Name of Facility: Suburban Steel Supply Company  
Person to Contact: Mark Debellis  
Address: 202 Township Road  
Pataskala, OH 43062

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**202 Township Road  
Pataskala, OHIO**

Description of proposed emissions unit(s):  
**SPRAY PAINTING IN SHOP AND YARD, UNPAVED ROADWAYS AND PARKING.**

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

## 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 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

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

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

#### **12. Best Available Technology**

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

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

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

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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>
VOC	47.9
PM	5.0
Single HAP	9.9
Combined HAPs	24.9

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**PART II: SPECIAL TERMS AND CONDITIONS**

**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>
Unpaved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05	<p>Particulate emissions shall not exceed 5.0 tons per year; No visible particulate emissions except for 3 minutes during any 60-minute period;</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g);</p>

**2. Additional Terms and Conditions**

- 2.a The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

All unpaved roadways

unpaved parking areas:

All unpaved parking areas

- 2.b The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable

requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using water. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.
- 2.e** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.f** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.g** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

## **B. Operational Restrictions**

Waste Oil shall be prohibited from being used as a dust suppressant. Any dust suppressant used shall be free of listed or characteristic hazardous waste or PCB.

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Emissions Unit ID: **F001**

**C. Monitoring and/or Recordkeeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

unpaved roadways

minimum inspection frequency

All unpaved roadways

Daily

unpaved parking areasminimum inspection frequency

All unpaved parking areas

Daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and,
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice

cover or precipitation; and,

- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the visible emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

2. Emission Limitation:

5.0 tons particulate matter per year

Applicable Compliance Method:

The above limitation shall be based on the equations found in AP-42, 13.2.1 and 13.2.2.

**F. Miscellaneous Requirements**

None.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Miscellaneous metal parts spray painted in shop	OAC rule 3745-31-05	Volatile organic compound emissions shall not exceed 6.50 pounds per hour excluding cleanup/purge material and 14.35 tons per year including cleanup/purge material.
	OAC Rule 3745-35-07	Individual HAP emissions from K001 and K002 shall not exceed 9.9 tons per rolling 12-month period;
	OAC rule 3745-21-09(U)(1)(d)	Total HAP emissions from K001 and K002 shall not exceed 24.9 tons per rolling 12-month period;
		3.5 pounds VOC per gallon of coating, excluding water and exempt solvents;

2. **Additional Terms and Conditions**

- 2.a None.

**B. Operational Restrictions**

1. The maximum emission rates for K001 and K002 shall be less than 10 tons of a single HAP per

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Emissions Unit ID: **K001**

year and/or 25 tons of combined HAPs per year, based upon a cumulative rolling, 12-month summation of the emission rates.

To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative HAP Emissions(Tons)</u>	<u>Maximum Allowable Cumulative HAPs Emissions (Tons)</u>
1	1.55	2.01
1-2	3.09	4.03
1-3	4.64	6.05
1-4	6.19	8.06
1-5	7.73	10.08
1-6	9.90	12.71
1-7	9.90	13.53
1-8	9.90	14.36
1-9	9.90	15.13
1-10	9.90	15.90
1-11	9.90	16.68
1-12	9.90	24.90

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual emission rate limitations shall be based upon a rolling, 12-month summation of the emission rates.

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

1. The permittee shall collect and record the following information each month for K001:
  - a. The name and identification number of each coating and cleanup/purge material employed.
  - b. The VOC content of each coating (excluding water and exempt solvents) and cleanup/purge material, in pounds per gallon.
  - c. The total volume, in gallons (excluding water and exempt solvents) of each coating and cleanup/purge material employed.
  - d. The total VOC emissions from all coatings and cleanup/purge materials employed in tons.
  - e. The individual HAP content of each coating (excluding water and exempt solvents) and cleanup/purge material in pounds per gallon.
  - f. The emission rate of single HAPs from all coatings (excluding water and exempt solvents) and cleanup/purge materials, in pounds or tons.

- g. The emission rate of combined HAPs from all coatings (excluding water and exempt solvents) and cleanup/purge materials employed, in pounds or tons.
- h. The cumulative rolling, 12-month summations of the emission rates for K001 and K002 required in each of the items f. and g. above.

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

1. The permittee shall notify the Director (the Central District Office) 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 Central District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the single and combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the allowable hours of operation. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the cumulative rolling 12-month emission rate limitations described in Part 1 - General Terms and Conditions of this permit under section (A)(1) during the previous calendar year. These reports shall be submitted by January 31 of each year.
5. All deviation reports shall include any corrective actions and preventive measures taken.

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

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

- a. Emission Limitation:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to

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Emissions Unit ID: **K001**

determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used

for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:

Volatile organic compound emissions shall not exceed 6.5 pounds per hour.

Applicable Compliance Method:

Multiply the maximum application rate of 1.86 gallons per hour by the maximum VOC content of 3.47 pounds per gallon.

c. Emission Limitation:

Volatile organic compound emissions shall not exceed 14.35 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in section (C)(1) and shall be the sum of the VOC emission rates for the calendar year.

d. Emission Limitation:

Individual HAP emissions from K001 and K002 shall not exceed 9.9 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in section (C)(2) and shall be the sum of the single HAP emission rates for the calendar year.

e. Emission Limitation:

Total HAP emissions from K001 and K002 shall not exceed 24.9 tons per rolling 12-month period.

Applicable Compliance Method:

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Emissions Unit ID: **K001**

Compliance shall be based upon the recordkeeping specified in section (C)(2) and shall be the sum of the combined HAP emission rates for the calendar year.

## F. Miscellaneous Requirements

### Air Toxic Policy Clarifying Language

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 and K002. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of each emission unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" compares the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following combines and summarizes the results of the modeling for the worst case pollutant from both emission units K001 and K002:

Pollutant: 2-Butoxyethanol

TLV (ug/m<sup>3</sup>): 121,000

Maximum Hourly Emission Rate (lbs/hr): 6.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1303.0

MAGLC (ug/m<sup>3</sup>): 1389.0

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

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Emissions Unit ID: **K001**

- d. 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 a listed TLV.

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The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Miscellaneous metal parts spray painted in yard	OAC rule 3745-31-05	Volatile organic compound emissions shall not exceed 15.18 pounds per hour excluding cleanup/purge material and 33.55 tons per year including cleanup/purge material.
	OAC Rule 3745-35-07	Individual HAP emissions from K001 and K002 shall not exceed 9.9 tons per rolling 12-month period;  Total HAP emissions from K001 and K002 shall not exceed 24.9 tons per rolling 12-month period;
	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents;

2. **Additional Terms and Conditions**

- 2.a None.

**B. Operational Restrictions**

1. The permittee shall comply with the restrictions found in B.2 for K001.

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Emissions Unit ID: **K002**

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

1. The permittee shall collect and record the following information each month for K002:
  - a. The name and identification number of each coating and cleanup/purge material employed.
  - b. The VOC content of each coating (excluding water and exempt solvents) and cleanup/purge material, in pounds per gallon.
  - c. The total volume, in gallons (excluding water and exempt solvents) of each coating and cleanup/purge material employed.
  - d. The total VOC emissions from all coatings and cleanup/purge materials employed in tons.
  - e. The individual HAP content of each coating (excluding water and exempt solvents) and cleanup/purge material in pounds per gallon.
  - f. The emission rate of single HAPs from all coatings (excluding water and exempt solvents) and cleanup/purge materials, in pounds or tons.
  - g. The emission rate of combined HAPs from all coatings (excluding water and exempt solvents) and cleanup/purge materials employed, in pounds or tons.
  - h. The cumulative rolling, 12-month summations of the emission rates for K001 and K002 required in each of the items f. and g. above.

### **D. Reporting Requirements**

1. The permittee shall notify the Director (the Central District Office) 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 Central District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the single and combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the allowable hours of operation. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the cumulative rolling 12-month emission rate limitations described in Part 1 - General Terms and Conditions of this permit under section (A)(1) during the previous calendar year. These reports shall be submitted by January 31 of each year.

5. All deviation reports shall include any corrective actions and preventive measures taken.

## E. Testing Requirements

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

a. Emission Limitation:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:

Volatile organic compound emissions shall not exceed 15.18 pounds per hour.

Applicable Compliance Method:

Multiply the maximum application rate of 4.35 gallons per hour by the maximum VOC content of 3.47 pounds per gallon.

c. Emission Limitation:

Volatile organic compound emissions shall not exceed 33.55 tons per year.

Applicable Compliance Method:

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**October 27, 1999**

Emissions Unit ID: **K002**

Compliance shall be based upon the recordkeeping specified in section (C)(1) and shall be the sum of the VOC emission rates for the calendar year.

d. Emission Limitation:

Individual HAP emissions from K001 and K002 shall not exceed 9.9 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in section (C)(2) and shall be the sum of the single HAP emission rates for the calendar year.

e. Emission Limitation:

Total HAP emissions from K001 and K002 shall not exceed 24.9 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in section (C)(2) and shall be the sum of the combined HAP emission rates for the calendar year.

**F. Miscellaneous Requirements**

See Section F. for K001.