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: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
OTTAWA COUNTY
Application No: 03-05558
Fac ID: 0362010110

DATE: 10/26/2006

Alpha Coatings Inc - Port Clinton Div
Darrell Preble
P.O. Box 1006
Fostoria, OH 44830

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

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 600** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA NWDO Toledo Metro Area Council of Gov. MI

OTTAWA COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **03-05558** FOR AN AIR CONTAMINANT SOURCE FOR
Alpha Coatings Inc - Port Clinton Div

On 10/26/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Alpha Coatings Inc - Port Clinton Div**, located at **228 Buckeye Blvd, Port Clinton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-05558:

Modification of PTI to add HAP emission restrictions.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-05558

Application Number: **03-05558**
APS Premise Number: **0362010110**
Permit Fee: **$ To be entered upon final issuance**
Name of Facility: **Alpha Coatings Inc - Port Clinton Div**
Person to Contact: **Darrell Preble**
Address: **P.O. Box 1006**
Fostoria, OH 44830

Location of proposed air contaminant source(s) [emissions unit(s)]:
228 Buckeye Blvd
Port Clinton, **OHIO**

Description of modification:
Modification of PTI to add HAP emission restrictions.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete 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).

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 ninety (90) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION 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 and regulations.

AIR EMISSION SUMMARY

Ohio EPA Source Number		Source Identification Description		BAT Determination
	K006		Spray Booth #4 (Clear Coat)	
		Spray Booth (Wheel)		
K001	R001			Not to Exceed 10 gallons/day, Compliance with Allowable Emission Rate
			Cold Cleaner	
		Spray Booth (Manual #1)		
K002				
	L001			Not to Exceed 10 gallons/day, Compliance with Allowable Emission Rate
		Spray Booth (Manual #2)		
K003	K001, K002, K003, K004, K005, K006, K008	Dip Spin		Not to Exceed 10 gallons/day, Compliance with Allowable Emission Rate
K004	K009, K010, K011, and K012, as a group (modification)	Roll Coat #1		Compliance with Permit Allowable Emission Rate
K005		Roll Coat #2		

Alpha Coatings Inc - Port Clinton Div Facility ID: **0362010110**
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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	Emission Rate			
Compliance with Permit Allowable Emission Rate			3745-31-05 3745-21-07(G)(2)	Permit Allowable Mass Emissions and/or Control/Usage Requirements
		Applicable Federal & OAC Rules		
		3745-31-05 3745-21-09(U)(2)(e)	3745-31-05 3745-21-09(O)(2) 3745-31-05(C)	Not to Exceed 10 Gallons Per Day of Coating Material (59.4 lbs VOC/Day)
Compliance with Permit Allowable Emission Rate		3745-31-05 3745-21-09(U)(2)(e)		Not to Exceed 10 Gallons Per Day of Coating Material (59.4 lbs VOC/Day)
		3745-31-05 3745-21-09(U)(2)(e)		Not to Exceed 10 Gallons Per Day of Coating Material (59.4 lbs VOC/Day)
Compliance with Permit Allowable Emission Rate		3745-31-05 3745-21-09(U)(2)(e)		Not to Exceed 10 Gallons Per Day of Coating Material (56.4 lbs VOC/Day)
		3745-31-05 3745-21-09(U)(2)(e)		Not to Exceed 10 Gallons Per Day of Coating Material (54.1 lbs VOC/Day)
Compliance with Permit Allowable		3745-31-05 3745-21-09(U)(2)(e)		Not to Exceed 10 Gallons Per Day of Coating Material (54.0 lbs VOC/Day)

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8 lbs VOC/hr, No More Than 40 lbs VOC/Day

1.07 lb/hr

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	VOC

	Tons/Year
HAPs	79.81 (includes cleanup) 9.9 tons individual and 24.9 tons combined

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Alpha Coatings, Inc. shall not employ more than ten gallons of coating materials in Sources K001, K002, K003, K004, K005, and K006 in any one day.

2. In conjunction with Condition #1, Alpha Coatings, Inc. shall maintain daily records which list the following information for each surface coating/cleanup material employed in Sources K001, K002, K003, K004, K005, and K006:

   A. Company I.D. of the coating/cleanup material

   B. The number of gallons employed per day

   C. The VOC content, in percent by volume

   D. The VOC density, in pounds per gallon

   E. The water content, in percent by volume (if any)

   F. The nonvolatile (solids) content, in percent by volume

   G. The number of hours each source operated

   These daily records, as well as any supporting coating analysis computations, shall be retained in the company's files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

3. The permittee has requested federally enforceable limitations of 9.9 tons of any individual Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act, and 24.9 tons of combined HAPs per rolling, 12-month period for emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, and K012, combined, for the purposes of avoiding the requirements of 40 CFR Part 63, Subpart MMMM. (Emissions units K005 and K006 were originally permitted as emissions units K002 and K003, respectively, in PTI #03-05558. Emissions units K009 and K012 were originally permitted as emissions units K001 and K004, respectively, in PTI #03-05560. Emissions units K010 and K011 were originally permitted as emissions units K002 and K003, respectively, in PTI #03-08604.)

   To ensure federal enforceability during the first 12 calendar months of operation, the permittee

shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates for emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, and K012, combined.

4. In order to demonstrate compliance with the rolling, 12-month HAP emission limitations, the permittee shall collect and record the following information for emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, and K012, combined:

A. The company identification of each coating employed.

B. The pounds per gallon of each HAP in each coating, as applied.

C. The number of gallons of each coating employed.

D. The emission rate, in pounds, for each HAP from each coating employed [(b) x (c)].

E. The total emission rate for each HAP from all coatings employed [summation of (d) for each HAP], in pounds per month.

F. The total HAP emission rate for the combination of all HAPs from all coatings employed [summation of (e)], in pounds per month.

G. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.

H. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

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

5. The permittee shall submit quarterly deviation (excursion) reports for emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, and K012, combined, as follows:

A. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the maximum allowable cumulative HAP emission levels specified in Additional Special Terms and Conditions #3.

B. After the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the rolling, 12-month HAP emission limitations.

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.

Synthetic Minor Determination

A. Source Description

Alpha Coatings, Inc - Port Clinton Plant involves eight coating operations for metal and non-metal parts.

B. Facility Emissions and Attainment Status

The issuance of this proposed permit will establish Alpha Coatings, Inc. as a minor stationary source for Maximum Achievable Control Technology (MACT) applicability by the establishment of synthetic minor limitation on HAPs. American Trim, L.L.C. is located in Ottawa County which is in attainment for all criteria pollutants

C. Source Emissions

The proposed permit will also establish the following HAP limitations:

9.9 tons/rolling 12-month period for any individual HAP from all coating operations (emissions unit K002, K003, K004, K005, R002, & R003 combined)

24.9 tons/rolling 12-month period for any combination of HAPs from all coating operations (emissions unit K002, K003, K004, K005, R002, & R003 combined)

D. Conclusion

The establishment of synthetic minor limitations on HAPs will establish Alpha Coating, Inc - Port Clinton Plant as a minor stationary source for MACT applicability.