



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
OTTAWA COUNTY
Application No: 03-08605

DATE: 12/7/2006

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 12/7/2006
Effective Date: 12/7/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-08605

Application Number: **03-08605**
APS Premise Number: **0362010110**
Permit Fee: **\$400**
Name of Facility: **Alpha Coatings Inc - Port Clinton Div Preble**
Person to Contact: **Darrell**
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 to 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

Alpha Coatings Inc - Port Clinton Div
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Facility ID: **0362010110**

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 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 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.

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.

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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.

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS 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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Alpha Coatings, Inc. - Port Clinton Plant** located in **OTTAWA** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification</u>	<u>Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>
	K008			
	K009,			
	K010,			
	K011, and			
	K012, as a group			
	(modification)			
		Spray Booth Wheel		
K001 (modification)			Compliance with terms and conditions of this permit.	3745-31-05 3745-21-09 (U)(2)(e)(ii)
		Manual Spray Booth #1		
K002 (modification)			Compliance with terms and conditions of this permit.	3745-31-05 3745-21-09 (U)(2)(e)(ii)
		Manual Spray Booth #2		
K003 (modification)			Compliance with terms and conditions of this permit.	3745-31-05 3745-21-09 (U)(2)(e)(ii)
		Manual Spray & Dip Booth #3		
K004 (modification)			Compliance with terms and conditions of this permit.	3745-31-05 3745-21-09 (U)(2)(e)(ii)
K001, K002, K003, K004, K005, K006,			Compliance with terms and conditions of this permit.	3745-31-05(C)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Permit Allowable Mass Emissions and/or Control/Usage Requirements	h period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs			
71.5 lbs/day				
9.9 tons per rolling, 12-month				

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**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	52.2
HAPs	9.9 tons individual and 24.9 tons combined

(Net VOC emission increase of 9.38 TPY)

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

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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

Introduction: A. Sources K001, K002, K003, and K004 each use less than 10 gallons of coating per day and therefore qualify for the 3745-21-09 (U)(2)(e) exemption which allows the company to use higher solvent compositions.

B. Sources K001, K002, and K003 have been modified from a VOC content of 5.94 pounds per gallon to 7.15 pounds per gallon. Also, source K004 has been modified from a VOC content of 5.64 pounds per gallon to 7.15 pounds per gallon. (This will result in a net VOC increase of 9.38 tons per year.)

1. Coating usage in sources K001, K002, K003, and K004 shall not exceed 10 gallons per day.
2. Alpha Coatings, Inc. shall not exceed the following usage/VOC content restrictions in sources K001, K002, K003, and K004:
 - A. VOC content of coating in pounds per gallon "as applied": 7.15 lbs/gallon;
 - B. short term emission limitation per source: 71.5 lbs/day;
 - C. long term emission limitation per source: 13.05 tons/year.
3. Alpha Coatings, Inc. shall only use the coatings contained in the Permit-to-Install (PTI) application dated November 23, 1994. Any changes in the compositions of these coatings not previously listed, require prior notification and approval by the Ohio EPA, Northwest District Office.
4. 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:

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Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
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.

5. The company shall maintain daily records which list the following information for all coatings employed in sources K001, K002, K003 and K004:
- A. company identification of the coating;
 - B. the number of gallons of each coating employed per day;
 - C. the VOC content of each coating "as applied"; and
 - D. the amount of VOC emitted (lbs/day and tons/year).

For any exceedance of the emission limitations and or coating restrictions of this permit, Alpha Coatings, Inc. shall notify the Ohio Environmental Protection Agency (OEPA), Northwest District Office, Division of Air Pollution Control within forty-five (45) days.

These records shall be maintained on company file for a period of no less than three years and be made available to the Director or any authorized representative of the Director for review during normal business hours.

6. 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:

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- 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, and
- 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.

7. The permittee shall submit quarterly reports documenting any exceedance of the emission limitations/coating restrictions for sources K001, K002, K003, and K004 to the Ohio EPA district office.

For each exceedance, the permittee shall also provide the following additional information:

- A. the cause of the excursion; and
- B. the action that has been taken and/or will be taken to correct the violation and prevent further occurrences.

The report shall be submitted by January 15, April 15, July 15, and October 15 of each year and shall cover the previous 3 month period. If no exceedances occurred, a report stating that fact is still required.

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8. 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 #4.
 - 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.

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9. All reports are to be submitted to the Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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.