



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
FRANKLIN COUNTY  
Application No: 01-7995**

**CERTIFIED MAIL**

**DATE: August 18, 1999**

Schuler Manufacturing Company  
Mark Williams  
4570 Edgewyn Avenue  
Hilliard, OH 43026

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** 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,

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

cc: USEPA  
DAPC, CDO  
Mid-Ohio Regional Planning Commission

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

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**Terms and  
Conditions**

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**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 01-7995**

Application Number: 01-7995  
APS Premise Number: 0125042407  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Schuler Manufacturing Company  
Person to Contact: Mark Williams  
Address: 4570 Edgewyn Avenue  
Hilliard, OH 43026

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4040 Fondorf  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**PAINTLINES FOR PAINTING MISCELLANEOUS METAL PARTS.**

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

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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**

**Schuler Manufacturing Company**

Facility ID: **0125042407**

PTI Application: **01-7995**

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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>
Volatile Organic Compounds	16.0
Single HAP	9.0
Total HAPS	16.0

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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>
#1 Paintline with one 56 gallon capacity and four, 25 gallon capacity dip tanks.	OAC rule 3745-31-05	Volatile organic compound (VOC) emissions shall not exceed 37.1 pounds per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of the emissions.
		VOC content of the coatings shall not exceed 5.3 pounds per gallon of coating.
		Coating usage shall not exceed 10 gallons per day.

**2. Additional Terms and Conditions**

- 2.a The 37.1 pounds of VOC per hour limit was established to reflect the potential to emit for K001. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b Emissions of any individual hazardous air pollutant (HAP) from K001 and K002 shall not exceed 9 tons per year, as a rolling, 12-month summation.
- 2.c No cleanup materials are used in K001.

**B. Operational Restrictions**

**Date: To be entered upon final issuance**

1. The maximum annual coating usage for K001 shall not exceed 3,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	250
1-2	500
1-3	750
1-4	1,000
1-5	1,250
1-6	1,500
1-7	1,750
1-8	2,000
1-9	2,250
1-10	2,500
1-11	2,750
1-12	3,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

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

1. The permittee shall collect and record the following information each day for the coating line:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following facility-wide information for each

**Date: To be entered upon final issuance**

month for the purpose of determining annual emissions of individual HAPs:

- a. Each individual HAP content of each coating employed, in lbs of individual HAP/gallon.
  - b. The calculated, emission rate of each individual HAP from all coatings employed, i.e., the summation of C.1.b. times C.2.a., respectively, divided by 2,000 lbs/ton.
  - c. The rolling 12-month total summation of each individual HAP from emission units K001 and K002.
3. The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions and coating usages:
- a. The coating usage for each month, i.e., monthly summation of C.1.c.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.
  - c. The VOC content of each coating, as applied, in pounds per gallon.
  - d. The total VOC emissions from all coatings in tons, i.e., summation of C.1.b. times C.3.c. respectively, divided by 2000 lbs/ton.

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

1. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports which specify the total VOC and each individual HAP emissions from K001 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 rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable

**Schuler Manufacturing Company**

PTI Application: **01 7005**

**Date:**

Facility ID: **0125042407**

Emissions Unit ID: **K001**

cumulative coating usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for VOCs and individual HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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

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

a. Emission Limitation:

37.1 lbs VOC/hr

**Date: To be entered upon final issuance**

Applicable Compliance Method:

Hourly VOC emissions from coating usage shall be determined by multiplying the maximum amount of coating that can be used per hour (7.0 gal/hr) with the maximum allowable VOC content of the coating (5.3 lbs/gal) to obtain VOC emissions in pounds per hour.

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

Compliance with the 8.0 tons per year shall be based upon the record keeping requirements specified in Section C.

c. Emission Limitation:

5.3 lbs VOC/gallon

Applicable Compliance Method:

Compliance shall be based upon the record keeping 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.

d. Emission Limitation-

The annual, individual HAP emissions from K001 and K002 at this facility shall be less than 10.0 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through the records

**Schuler Manufacturing Company**PTI Application: **01 7005****Date:**Facility ID: **0125042407**Emissions Unit ID: **K001**

required pursuant to Section C.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. 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 limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: V.M. &amp; P. Naphtha

TLV (ug/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 25.49

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1448.3

MAGLC (ug/m3): 32,620

Pollutant: Toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 8.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 501.74

MAGLC (ug/m3): 4,476

Pollutant: Ethylbenzene

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 168.65

MAGLC (ug/m3): 10,333

Pollutant: Xylene

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 16.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 959.2

MAGLC (ug/m3): 10,333

Pollutant: Cumene

**Schulc**PTI A<sub>1</sub>Emissions Unit ID: **K001****Date: To be entered upon final issuance**

TLV (ug/m3): 246  
Maximum Hourly Emission Rate (lbs/hr): 0.44  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.3  
MAGLC (ug/m3): 5,857

Pollutant: Trimethyl benzene  
TLV (ug/m3): 123  
Maximum Hourly Emission Rate (lbs/hr): 6.16  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350  
MAGLC (ug/m3): 2,928.57

Pollutant: Ethanol  
TLV (ug/m3): 1880  
Maximum Hourly Emission Rate (lbs/hr): 0.26  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.75  
MAGLC (ug/m3): 44,761

Pollutant: Methyl ethyl ketone  
TLV (ug/m3): 590  
Maximum Hourly Emission Rate (lbs/hr): 0.11  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.32  
MAGLC (ug/m3): 14,047

Pollutant: 2-Butoxyethanol  
TLV (ug/m3): 121  
Maximum Hourly Emission Rate (lbs/hr): 9.28  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 527  
MAGLC (ug/m3): 2,880

Pollutant: Trimethyl amine  
TLV (ug/m3): 12  
Maximum Hourly Emission Rate (lbs/hr): 0.371  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21.08  
MAGLC (ug/m3): 285.7

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":

**Date: To be entered upon final issuance**

- 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,
- 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.

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>
Paintline #2 with one 56 gallon capacity and four, 25 gallon capacity and dip tanks.	OAC rule 3745-31-05          OAC rule 3745-21-09(U)(2)(e)(ii)	<p>Volatile organic compound (VOC) emissions shall not exceed 37.1 pounds per hour</p> <p>Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of the emissions.</p> <p>VOC content of the coatings shall not exceed 5.3 pounds per gallon of coating.</p> <p>Coating usage shall not exceed 10 gallons per day.</p>

**2. Additional Terms and Conditions**

- 2.a The 37.1 pounds of VOC per hour limit was established to reflect the potential to emit for K002. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b Emissions of any individual hazardous air pollutant (HAP) from K001 and K002 shall not exceed 9 tons per year, as a rolling, 12-month summation.
- 2.c No cleanup materials are used in K002.

**B. Operational Restrictions**

**Date: To be entered upon final issuance**

1. The maximum annual coating usage for K002 shall not exceed 3,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	250
1-2	500
1-3	750
1-4	1,000
1-5	1,250
1-6	1,500
1-7	1,750
1-8	2,000
1-9	2,250
1-10	2,500
1-11	2,750
1-12	3,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

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

1. The permittee shall collect and record the following information each day for the coating line:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following facility-wide information for each

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month for the purpose of determining annual emissions of individual HAPs:

- a. Each individual HAP content of each coating employed, in lbs of individual HAP/gallon.
  - b. The calculated, emission rate of each individual HAP from all coatings employed, i.e., the summation of C.1.b. times C.2.a., respectively, divided by 2,000 lbs/ton.
  - c. The rolling 12-month total summation of each individual HAP from emission units K001 and K002.
3. The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions and coating usages:
- a. The coating usage for each month, i.e., monthly summation of C.1.c.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.
  - c. The VOC content of each coating, as applied, in pounds per gallon.
  - d. The total VOC emissions from all coatings in tons, i.e., summation of C.1.b. times C.3.c. respectively.

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

1. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports which specify the total VOC and each individual HAP emissions from K002 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 rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. These reports are due by the date described in Part 1 -

**Schuler Manufacturing Company**

PTI Application: **01 7005**

**Date:**

Facility ID: **0125042407**

Emissions Unit ID: **K002**

General Terms and Conditions of this permit under section A.1.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for VOCs and individual HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

**E. Testing Requirements**

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

**Date: To be entered upon final issuance**

- a. Emission Limitation:

37.1 lbs VOC/hr

Applicable Compliance Method:

Hourly VOC emissions from coating usage shall be determined by multiplying the maximum amount of coating that can be used per hour (7.0 gal/hr) with the maximum allowable VOC content of the coating (5.3 lbs/gal) to obtain VOC emissions in pounds per hour.

- b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

Compliance with the 8.0 tons per year shall be based upon the record keeping requirements specified in Section C.

- c. Emission Limitation:

5.3 lbs VOC/gallon

Applicable Compliance Method:

Compliance shall be based upon the record keeping 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.

- d. Emission Limitation-

The annual, individual HAP emissions from K001 and K002 at this facility shall be less than 10.0 tons per year as a rolling, 12-month summation.

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Schule

PTI A<sub>1</sub>

**Date: To be entered upon final issuance**

Emissions Unit ID: **K002**

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through the records required pursuant to Section C.

**Date: To be entered upon final issuance**

## **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. 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 limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: V.M. & P. Naphtha

TLV (ug/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 25.49

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1448.3

MAGLC (ug/m3): 32,620

Pollutant: Toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 8.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 501.74

MAGLC (ug/m3): 4,476

Pollutant: Ethylbenzene

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 168.65

MAGLC (ug/m3): 10,333

Pollutant: Xylene

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 16.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 959.2

MAGLC (ug/m3): 10,333

Pollutant: Cumene

TLV (ug/m3): 246

**Schuler Manufacturing Company**

PTI Application: **01 7005**

**Date:**

Facility ID: **0125042407**

Emissions Unit ID: **K002**

Maximum Hourly Emission Rate (lbs/hr): 0.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.3

MAGLC (ug/m3): 5,857

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Pollutant: Trimethyl benzene

TLV (ug/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 6.16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350

MAGLC (ug/m3): 2,928.57

Pollutant: Ethanol

TLV (ug/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.75

MAGLC (ug/m3): 44,761

Pollutant: Methyl ethyl ketone

TLV (ug/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 0.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.32

MAGLC (ug/m3): 14,047

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 9.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 527

MAGLC (ug/m3): 2,880

Pollutant: Trimethyl amine

TLV (ug/m3): 12

Maximum Hourly Emission Rate (lbs/hr): 0.371

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21.08

MAGLC (ug/m3): 285.7

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

**Date: To be entered upon final issuance**

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,
- 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.

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.