



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
LICKING COUNTY
Application No: 01-8003**

CERTIFIED MAIL

DATE: October 20, 1999

Modern Welding
Gerald Franks
PO Box 2265
Newark, OH 43056

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,

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

cc: USEPA
DAPC, CDO

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

**Terms and
Conditions**

**Issue Date: October 20, 1999
Effective Date: October 20, 1999**

FINAL PERMIT TO INSTALL 01-8003

Application Number: 01-8003
APS Premise Number: 0145020338
Permit Fee: **\$600**
Name of Facility: Modern Welding
Person to Contact: Gerald Franks
Address: PO Box 2265
Newark, OH 43056

Location of proposed air contaminant source(s) [emissions unit(s)]:
**72 Waldo Street
Newark, Ohio**

Description of proposed emissions unit(s):
ADDITION OF NEW PAINT ROOM.

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

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements 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

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October 20, 1999

Facility ID: **0145020338**

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	40.7
Single HAP	9
Total HAP	24

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>
Number 1 coating room	OAC rule 3745-31-05	16.1 lbs VOC/hr 39.9 tons VOC/yr
		See A.2.a-d

2. Additional Terms and Conditions

- 2.a The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be 9 TPY for any single HAP and 24 TPY for any combination of HAPs, based upon rolling, 12-month summations.
- 2.b To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001 , K002 and P001.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of any single HAP(Tons)</u>
0-6	4.5
1-7	5.25
1-8	6.0
1-9	6.75

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Model
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October 20, 1999

Emissions Unit ID: **K001**

1-10	7.5
1-11	8.25
1-12	9.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

- 2.c To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001, K002 and P001 combined.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of Total HAPs(Tons)</u>
0-6	12.0
1-7	14.0
1-8	16.0
1-9	18.0
1-10	20.0
1-11	22.0
1-12	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

- 2.d To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001, K002 and P001 combined.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of VOCs(Tons)</u>
0-6	20.4
1-7	23.8
1-8	27.2
1-9	30.6
1-10	34.0
1-11	37.4
1-12	40.7

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

B. Operational Restrictions

1. The facility has existing records which demonstrate compliance with the following input restrictions:
 - a. The maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period.
 - b. The maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period.
 - c. The maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
2. The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.
3. The VOC content of each clean up material employed in emissions units K001 and K002 shall not exceed 7.26 pounds of VOC per gallon of clean up material.
4. The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed 0.87 pounds of VOC per gallon of resin coating.
5. The total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation.
6. The total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.

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Facility ID: 0145020338

Emissions Unit ID: **K001**

7. The total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following daily records for each surface coating employed in emission unit K001:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

- c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from emissions unit K001:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons .
3. The permittee shall collect and record the following information each month for each coating(resin and non resin) and cleanup material employed in emission units K001:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed. This value shall be calculated by subtracting the amount of recovered clean up material from the amount of

clean up material employed;

- i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);

- j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);
 - k. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);
 - l. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);
 - m. number of hours of operation; and,
 - n. the rolling, 12-month volatile organic compound emissions summation for all coatings all cleanup materials, in pounds or tons per year.
4. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative organic compound, single HAP, and total HAP emissions, in tons , for each calendar month. Note: the purpose of this term is to demonstrate compliance with the emission limitations specified in section A.2(A-D) of this permit.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable emission levels. Additionally, the permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC content limits, VOC emission limits,

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Facility ID: 0145020338

Emissions Unit ID: **K001**

coating usage limits (for all coatings and all cleanup materials employed in emission units K001, K002 and P001), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

2. The permittee shall submit annual reports which summarize the following:
 - a. the total VOC emissions from all coatings and cleanup materials employed in emission units K001, K002 and P001, combined and individually; and,
 - b. the total HAP emissions for each individual HAP and for all combined HAPS from emission units K001, K002 and P001, combined.

The permittee shall submit annual reports which identify any exceedances of the coating usage limitations, as well as the corrective actions that were taken to achieve compliance.

The annual reports required by this permit shall be submitted by January 31 of each year.

3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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.

The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitations:

Model
PTI A₁
October 20, 1999

Emissions Unit ID: **K001**

16.1 lbs VOC/hr , 39.9 tons VOC/yr and total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations:

Maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period, maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period and maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the usage limits in this permit shall be determined by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations:

Total HAP emissions for emissions units K001 , K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation and total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitation:

The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed 0.87 pounds of VOC per gallon of resin coating.

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Facility ID: 0145020338

Emissions Unit ID: **K001****Applicable Compliance Method:**

Compliance with the 0.87 pound VOC/pound of styrene emission limit in this permit for each resin coating employed by K001 shall be calculated using an emission factor of 0.2 lb Styrene emitted/lb Styrene contained in the resin.

Emission Limitation:

The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Applicable Compliance Method:

A. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. 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 or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

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: Toluene**TLV (mg/m³): 188****Maximum Hourly Emission Rate (lbs/hr): .93****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 228****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476****Pollutant: Ethylbenzene****TLV (mg/m³): 434****Maximum Hourly Emission Rate (lbs/hr): .95****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):233****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10,333****Pollutant: xylene****TLV (mg/m³): 434****Maximum Hourly Emission Rate (lbs/hr): 3.62****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 889****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):10333****Pollutant: styrene**

TLV (mg/m³):213
Maximum Hourly Emission Rate (lbs/hr): 16.35
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
4,013
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):5071

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590
Maximum Hourly Emission Rate (lbs/hr): 3.5
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
859
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):14048

Pollutant: methanol

TLV (mg/m³): 262
Maximum Hourly Emission Rate (lbs/hr): .02
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
5
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):6,238

Pollutant: methyl isobutyl ketone

TLV (mg/m³): 205
Maximum Hourly Emission Rate (lbs/hr): 1.63
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
401
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):4881

Pollutant: glycol ethers

TLV (mg/m³): 121
Maximum Hourly Emission Rate (lbs/hr): 2.04
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
501
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):2881

Pollutant: benzene**TLV (mg/m3): 32****Maximum Hourly Emission Rate (lbs/hr): .02****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
5****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):762****Pollutant: naphthalene****TLV (mg/m3): 52****Maximum Hourly Emission Rate (lbs/hr): 1.13****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
278****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):1,238**

Note: The above stated lb/hr emission rates do not constitute a limit for emission units K001 and P001 provided that compliance with the Air Toxics Policy is maintained.

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
- 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.

2. This PTI supercedes PTI # 01-6408, as issued on March 25, 1998.

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>
Number 2 coating room	OAC rule 3745-31-05	16.1 lbs VOC/hr 39.9 tons VOC/yr See A.2.a-d

2. Additional Terms and Conditions

- 2.a The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be 9 TPY for any single HAP and 24 TPY for any combination of HAPs, based upon rolling, 12-month summations.
- 2.b To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001 , K002 and P001.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of any single HAP(Tons)</u>
0-6	4.5
1-7	5.25
1-8	6.0
1-9	6.75

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Emissions Unit ID: **K002**

1-10	7.5
1-11	8.25
1-12	9.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

- 2.c To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001, K002 and P001 combined.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of Total HAPs(Tons)</u>
0-6	12.0
1-7	14.0
1-8	16.0
1-9	18.0
1-10	20.0
1-11	22.0
1-12	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

- 2.d To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001, K002 and P001 combined.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of VOCs(Tons)</u>
0-6	20.4
1-7	23.8
1-8	27.2
1-9	30.6
1-10	34.0

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Emissions Unit ID: **K002**

1-11	37.4
1-12	40.7

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

B. Operational Restrictions

1. The facility has existing records which demonstrate compliance with the following input restriction:
 - a. The maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period.
 - b. The maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period.
 - c. The maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
2. The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.
3. The VOC content of each clean up material employed in emissions units K001 and K002 shall not exceed 7.26 pounds of VOC per gallon of clean up material.
4. The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed 0.87 pounds of VOC per gallon of resin coating.
5. The total HAP emissions for emissions units K001, K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation.
6. The total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.
7. The total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following daily records for each surface coating employed in emission unit K002:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from emissions unit K002:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons .
3. The permittee shall collect and record the following information each month for each coating(resin and non resin) and cleanup material employed in emission units K002:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds of each coating employed;

- e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed. This value shall be calculated by subtracting the amount of recovered clean up material from the amount of clean up material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);
 - k. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);
 - l. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);
 - m. number of hours of operation; and,
 - n. the rolling, 12-month volatile organic compound emissions summation for all coatings all cleanup materials, in pounds or tons per year.
4. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative organic compound, single HAP, and Total HAP emissions, in tons , for each calendar month. Note: the purpose of this term is to demonstrate compliance with the emission limitations specified in section A.2(A-D) of this permit.
 5. The permittee shall collect and record the following information for each change where

the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable emission levels. Additionally, the permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC content limits, VOC emission limits, coating usage limits (for all coatings and all cleanup materials employed in emission units K001, K002 and P001), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

2. The permittee shall submit annual reports which summarize the following:
 - a. the total VOC emissions from all coatings and cleanup materials employed in emission units K001, K002 and P001, combined and individually; and,
 - b. the total HAP emissions for each individual HAP and for all combined HAPS from emission units K001, K002 and P001, combined.

The permittee shall submit annual reports which identify any exceedances of the coating usage limitations, as well as the corrective actions that were taken to achieve compliance.

The annual reports required by this permit shall be submitted by January 31 of each year.

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3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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.

The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitations:

16.1 lbs VOC/hr , 39.9 tons VOC/yr and total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations:

Maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period, maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period and maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the usage limits in this permit shall be determined by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations:

Total HAP emissions for emissions units K001 , K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation and total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations:

The maximum VOC emission rate from any resin coating material employed in emissions units K001 and K002 shall not exceed 0.87 pounds of VOC per gallon of resin coating.

Applicable Compliance Method:

Compliance with the 0.87 pound VOC/pound of styrene emission limit in this permit for each resin coating employed by K002 shall be calculated using an emission factor of 0.2 lb Styrene emitted/lb Styrene contained in the resin.

Emission Limitation:

The VOC content of each non resin coating material employed in emissions units K001 and K002 shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as calculated on a daily volume weighted average basis.

Applicable Compliance Method:

A. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. 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 or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

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: Toluene**TLV (mg/m³): 188****Maximum Hourly Emission Rate (lbs/hr): 3.26****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 789****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476****Pollutant: Ethylbenzene****TLV (mg/m³): 434****Maximum Hourly Emission Rate (lbs/hr): 1.19****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 287****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10,333****Pollutant: xylene****TLV (mg/m³): 434****Maximum Hourly Emission Rate (lbs/hr): 5.1****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 1,232****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333****Pollutant: styrene**

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TLV (mg/m3):213

Maximum Hourly Emission Rate (lbs/hr): 16.4

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
3,965**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):5071

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.75

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
907**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):14048

Pollutant: methanol**TLV (mg/m3): 262****Maximum Hourly Emission Rate (lbs/hr): .02****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
4****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):6,238****Pollutant: methyl isobutyl ketone****TLV (mg/m3): 205****Maximum Hourly Emission Rate (lbs/hr): 1.63****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
395****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4881****Pollutant: glycol ethers****TLV (mg/m3): 121****Maximum Hourly Emission Rate (lbs/hr): 3.22****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
778****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):2881****Pollutant: benzene****TLV (mg/m3): 32****Maximum Hourly Emission Rate (lbs/hr): .02****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
5****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):762****Pollutant: naphthalene****TLV (mg/m3): 52****Maximum Hourly Emission Rate (lbs/hr): .57****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
138****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):1,238**

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Pollutant: nitroethane

TLV (mg/m³): 307

Maximum Hourly Emission Rate (lbs/hr): .43

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
103**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):7,310

Pollutant: methyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.76

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 909

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):5,548

Pollutant: trimethylbenzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 2.49

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):601

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):2,929

Pollutant: furfuryl alcohol

TLV (mg/m3): 40

Maximum Hourly Emission Rate (lbs/hr): .57

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):137

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 952

Pollutant: butyl acetate

TLV (mg/m3):713

Maximum Hourly Emission Rate (lbs/hr): 2.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 661

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):16,976

Pollutant: VM and P naptha

TLV (mg/m3): 1,370

Maximum Hourly Emission Rate (lbs/hr): 8.74

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,113

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 32,619

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Emissions Unit ID: **K002**

Pollutant: ethyl alcohol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 5.34

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
1,292**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,762

Pollutant: isopropyl alcohol**TLV (mg/m3): 983****Maximum Hourly Emission Rate (lbs/hr): .85****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
206****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,405****Pollutant: propylene glycol monomethyl ether****TLV (mg/m3): 369****Maximum Hourly Emission Rate (lbs/hr): 4.28****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
1,034****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,786****Pollutant: butyl alcohol****TLV (mg/m3): 303****Maximum Hourly Emission Rate (lbs/hr): 2.74****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
662****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 7,214****Pollutant: diacetone alcohol****TLV (mg/m3): 238****Maximum Hourly Emission Rate (lbs/hr): .77****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
186****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5,667****Pollutant: butyl glycidyl ether****TLV (mg/m3): 133****Maximum Hourly Emission Rate (lbs/hr): .8****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
193****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3,167**

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Emissions Unit ID: **K002**

Pollutant: ethylene glycol

TLV (mg/m³): 127

Maximum Hourly Emission Rate (lbs/hr): .32

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
78**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 1,566

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Emissions Unit ID: **K002**

Pollutant: hexyl acetate

TLV (mg/m³): 295

Maximum Hourly Emission Rate (lbs/hr): .95

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
229**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 7,204

Pollutant: methyl n-propyl ketone

TLV (mg/m³): 705

Maximum Hourly Emission Rate (lbs/hr): .93

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
226**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 16,786

Note: The above stated lb/hr emission rates do not constitute a limit for emission units K002 provided that compliance with the Air Toxics Policy is maintained.

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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- 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.

- 2. This PTI supercedes PTI # 01-6408, as issued on March 25, 1998.

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>
Paint mix room	OAC rule 3745-31-05	0.33 lb OC/hr .81 ton OC/yr See A.2.a-d

2. Additional Terms and Conditions

- 2.a The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be 9 TPY for any single HAP and 24 TPY for any combination of HAPs, based upon rolling, 12-month summations.
- 2.b To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001 , K002 and P001.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of any single HAP(Tons)</u>
0-6	4.5
1-7	5.25
1-8	6.0
1-9	6.75
1-10	7.5
1-11	8.25

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Emissions Unit ID: **P001**

1-12 9.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

- 2.c To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001, K002 and P001 combined.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of Total HAPs(Tons)</u>
0-6	12.0
1-7	14.0
1-8	16.0
1-9	18.0
1-10	20.0
1-11	22.0
1-12	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

- 2.d To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for emissions units K001, K002 and P001 combined.

<u>Month(s)</u>	<u>Maximum Allowable Emissions of VOCs(Tons)</u>
0-6	20.4
1-7	23.8
1-8	27.2
1-9	30.6
1-10	34.0

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Emissions Unit ID: **P001**

1-11	37.4
1-12	40.7

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12 month summation of emissions from K001, K002 and P001.

B. Operational Restrictions

1. The facility has existing records which demonstrate compliance with the following input restrictions:

Emissions Unit ID: P001

- a. The maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period.
 - b. The maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period.
 - c. The maximum clean up material usage for emissions unit K001, K002 and P001 shall not exceed 770 gallons per rolling 12 month period.
2. The total HAP emissions for emissions units K001 , K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation.
 3. The total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.
 4. The total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emission unit P001:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
 - f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and

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Emissions Unit ID: **P001**

photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for each coating (resin and non resin) and cleanup material employed in emission units P001:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed. This value shall be calculated by subtracting the amount of recovered clean up material from the amount of clean up material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);

- k. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);
 - l. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);
 - m. number of hours of operation; and,
 - n. the rolling, 12-month volatile organic compound emissions summation for all coatings all cleanup materials, in pounds or tons per year.
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable emission levels. Additionally, the permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC content limits, VOC emission limits, coating usage limits (for all coatings and all cleanup materials employed in emission units K001, K002 and P001), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

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2. The permittee shall submit annual reports which summarize the following:
 - a. the total VOC emissions from all coatings and cleanup materials employed in emission units K001, K002 and P001, combined and individually; and,
 - b. the total HAP emissions for each individual HAP and for all combined HAPS from emission units K001, K002 and P001, combined.

The permittee shall submit annual reports which identify any exceedances of the coating usage limitations, as well as the corrective actions that were taken to achieve compliance.

The annual reports required by this permit shall be submitted by January 31 of each year.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitations:

0.33 lb OC/hr , 0.81 ton OC/yr and total VOC emissions for emissions units K001, K002 and P001 combined shall not exceed the 40.7 Tons VOC per year based upon a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitations:

Maximum resin coating usage for emissions unit K001, K002 and P001 shall not exceed 20,500 gallons per rolling 12 month period, maximum non resin coating usage for emissions unit K001, K002 and P001 shall not exceed 18,000 gallons per rolling 12 month period and maximum clean up material usage for emissions unit K001, K002

and P001 shall not exceed 770 gallons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the usage limits in this permit shall be determined by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitation:

Total HAP emissions for emissions units K001 , K002 and P001 combined shall not exceed the 24 Tons HAP per year based upon a rolling 12 month summation and total annual emissions of any single HAP for emissions units K001, K002 and P001 combined shall not exceed the 9.0 Tons per year based upon a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the HAP emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Applicable Compliance Method:

A. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. 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 or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

Compliance with the applicable emission limits in this permit for P001 shall be calculated using an emission factor of 0.02 lb VOC emitted/lb VOC mixed.

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

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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: Toluene**TLV (mg/m³): 188****Maximum Hourly Emission Rate (lbs/hr): .93****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 228****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476****Pollutant: Ethylbenzene****TLV (mg/m³): 434****Maximum Hourly Emission Rate (lbs/hr): .95****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):233****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10,333****Pollutant: xylene****TLV (mg/m³): 434****Maximum Hourly Emission Rate (lbs/hr): 3.62****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 889****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):10333**

Pollutant: styrene**TLV (mg/m3):213****Maximum Hourly Emission Rate (lbs/hr): 16.35****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
4,013****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):5071****Pollutant: methyl ethyl ketone****TLV (mg/m3): 590****Maximum Hourly Emission Rate (lbs/hr): 3.5****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
859****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):14048****Pollutant: methanol****TLV (mg/m3): 262****Maximum Hourly Emission Rate (lbs/hr): .02****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
5****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):6,238****Pollutant: methyl isobutyl ketone****TLV (mg/m3): 205****Maximum Hourly Emission Rate (lbs/hr): 1.63****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
401****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4881****Pollutant: glycol ethers****TLV (mg/m3): 121****Maximum Hourly Emission Rate (lbs/hr): 2.04****Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
501****Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):2881**

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Pollutant: benzene

TLV (mg/m³): 32

Maximum Hourly Emission Rate (lbs/hr): .02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):

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Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):762

Pollutant: naphthalene

TLV (mg/m³): 52

Maximum Hourly Emission Rate (lbs/hr): 1.13

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³):
278**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³):1,238

Note: The above stated lb/hr emission rates do not constitute a limit for emission units K001 and P001 provided that compliance with the Air Toxics Policy is maintained.

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,
- 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

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- 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.

2. This PTI supercedes PTI # 01-6408, as issued on March 25, 1998.