

Synthetic Minor Determination and/or Netting Determination

Permit To Install **03-16139**

A. Source Description

Moritz International, Inc. has proposed to modify an existing miscellaneous metal parts coating line and install a new miscellaneous metal parts coating line. The purpose of the modification is to incorporate new coatings. The permittee is requesting federally enforceable limits based on annual production for both coating lines.

B. Facility Emissions and Attainment Status

Moritz International, Inc. is located in Richland County. Richland County is considered attainment for all criteria pollutants. The permittee is requesting federally enforceable limitations to avoid MACT and Title V permitting requirements.

C. Source Emissions

Moritz International, Inc. has requested federally enforceable limitations to restrict the potential to emit of hazardous air pollutants (HAPs) to 9.09 tons per year for any individual HAP and 23.06 tons per year from any combination of HAPs for emission units K001 & K002 combined. The company has also requested a federally enforceable limitation to restrict the potential to emit of VOC's to 26.25 tons per year for emissions units K001 & K002 combined.

D. Conclusion

By restricting annual HAP emissions to 9.09 tons per year for any individual HAP and 23.06 tons per year from any combination of HAPs for emission units K001 & K002 combined and VOC emissions to 26.25 tons per year for emissions units K001 & K002 combined, the permittee will not be subject to MACT and Title V permitting requirements. Recordkeeping and excursion reports will be required to ensure compliance.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
RICHLAND COUNTY
Application No: 03-16139**

CERTIFIED MAIL

DATE: 6/24/2004

Moritz International
Frank Moritz
665 North Main Street
Mansfield, OH 44902

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 **\$300** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO

Richland Co Reg Planning Commission

RICHLAND COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 03-16139 FOR AN AIR CONTAMINANT SOURCE FOR MORITZ INTERNATIONAL

On 6/24/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Moritz International**, located at **665 North Main Street, Mansfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16139:

Modification to spray booth 1 (K001) to incorporate different coatings, synthetic minor restrictions, and installation of new spray booth.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-16139

Application Number: 03-16139
APS Premise Number: 0370010048
Permit Fee: **To be entered upon final issuance**
Name of Facility: Moritz International
Person to Contact: Frank Moritz
Address: 665 North Main Street
Mansfield, OH 44902

Location of proposed air contaminant source(s) [emissions unit(s)]:

**665 North Main Street
Mansfield, Ohio**

Description of proposed emissions unit(s):

Modification to spray booth 1 (K001) to incorporate different coatings, synthetic minor restrictions, and installation of new spray booth.

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

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

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 cannot meet the requirements of this permit or cannot meet applicable standards.

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

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

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3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

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	26.25
OC (Cleanup Only)	7.46
Individual HAPs	9.09
Combined HAPs	23.06

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Miscellaneous metal parts coating line with dry filtration; spray booth #1 (modification to PTI 03-8666 issued on June 14, 1995, to allow for the use of different coatings and establish federally enforceable limits on annual coating usage)	OAC rule 3745-31-05 (A) (3)	26.25 lbs volatile organic compounds (VOC)/hr from coating operations 621.4 lbs organic compounds (OC)/month & 3.73 tons OC/yr from cleanup operations (see A.2.c. and B.2.) See A.2.a
	OAC rule 3745-31-05 (C)	26.25 tons VOC per rolling 12-month period for emissions unit K001 and K002 combined (See A.2.b.) 9.09 tons per rolling 12-month period for any individual Hazardous Air Pollutant (HAP) and 23.06 tons per rolling 12-month period for any combination of HAPs for emission units K001 and K002 combined (See A.2.d.)
	OAC rule 3745-21-09 (U) (1) (C)	3.5 lbs of volatile organic compound per gallon excluding water and exempt solvents, for an extreme performance coating

Morit

PTI A

Emissions Unit ID: **K001**

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2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with OAC rule 3745-21-09 (U) (1) (c) and OAC rule 3745-31-05 (C).
- 2.b** The emissions of VOC from emissions units K001 and K002 combined shall not exceed 26.25 tons per year based on a rolling, 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on coating usage restrictions (See B.1.) and VOC content requirements established by OAC rule 3745-21-09 (U) (1) (c). Federally enforceable VOC limitations are being established for the purpose of avoiding Title V applicability (See B.1).
- 2.c** The emission limitation for cleanup operations involve organic compounds which do not participate in atmospheric photochemical reactions (See B.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).
- 2.d** HAP emissions from emissions units K001 and K002 combined, shall not exceed 9.09 tons per year for any individual HAP and 23.06 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions.

Federally Enforceable HAP limitations are being established for purposes of avoiding MACT and Title V applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Month(s)	Individual HAP	Combined HAPs
1-1	2.27	5.77
1-2	2.89	7.34
1-3	3.51	8.91
1-4	4.13	10.48
1-5	4.75	12.05
1-6	5.37	13.62
1-7	5.99	15.19
1-8	6.61	16.76
1-9	7.23	18.33
1-10	7.85	19.90
1-11	8.47	21.47

Morit

PTI A

Emissions Unit ID: **K001**

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1-12	9.09	23.06
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After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

1. The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 15,000 gallons. The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Month(s)	Gallon Usage
1-1	3750
1-2	4773
1-3	5796
1-4	6819
1-5	7842
1-6	8865
1-7	9888
1-8	10,911
1-9	11,934
1-10	12,957
1-11	13,980
1-12	15,000

After the first 12 calendar months of operation, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01, for cleanup operations in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for coating usage in this emissions unit:
 - a. the company name and identification for each coating employed;

- b. the VOC content of each coating, as applied, in lbs/gallon;
 - c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate from all coatings employed, in lbs [summation of VOC emission rate ("b" x "d") for each individual coating].
2. In conjunction with the recordkeeping requirements specified in C.1. above, the permittee shall also record the following each month for emission units K001 and K002 combined:
- a. for the first 12 months of operation, the cumulative total monthly emission rate of VOC, in tons per month; and,
 - b. after the first 12 months of operation, the total annual emissions of VOC, in tons, based on a rolling, 12-month summation.
3. The permittee shall collect and record the following each month for cleanup material usage in this emissions unit:
- a. the company name and identification for each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100 (s);
 - c. the OC content of each cleanup material employed, in lbs/gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the OC emission rate for each cleanup material employed, ("c" x "d"), in lbs/month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density

Morit

PTI A

Emissions Unit ID: **K001**

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- f. the total OC emission rate, in tons, for all cleanup materials employed (sum of "e"); and
 - g. the annual, year to date OC emissions, in tons, from all cleanup materials employed, (sum of "f") for each calendar month to date from January to December).
 4. The permittee shall collect and record the following information regarding HAP emissions each month for emission unit K001 and K002 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate ("b" x "c") for each individual coating/cleanup material], in lbs/month;
 - e. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, (sum of "d" for all HAPs) in lbs/month;
 - f. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
 - g. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.
 5. In addition to the above information, the permittee shall also collect and record the following information each month for emission units K001 and K002 combined:
 - a. for the first 12 months of operation:
 - i. the cumulative gallon usage rate for each coating; and
 - ii. the total number of gallons of all coatings.
 - b. after the first 12 months of operation the annual number of gallons of all coatings based upon a rolling, 12-month summation of the monthly coating usage rates.

Emissions Unit ID: **K001**

- The permit to install for emission units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl n-amyl ketone
TLV (mg/m3): 233.497
Maximum Hourly Emission Rate (lbs/hr): 10.727
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5318.52
MAGLC (ug/m3): 5559

Pollutant: Ethylbenzene
TLV (mg/m3): 434.192
Maximum Hourly Emission Rate (lbs/hr): 1.533
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 760.07
MAGLC (ug/m3): 10338

Pollutant: xylene
TLV (mg/m3): 434.192
Maximum Hourly Emission Rate (lbs/hr): 8.149
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4040.37
MAGLC (ug/m3): 10338

Pollutant: MIBK
TLV (mg/m3): 204.826
Maximum Hourly Emission Rate (lbs/hr): 9.094
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4508.83
MAGLC (ug/m3): 4877

Pollutant: acetone
TLV (mg/m3): 11871.17
Maximum Hourly Emission Rate (lbs/hr): 18.070

Morit:

PTI A

Emissions Unit ID: **K001**

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Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 8959.22

MAGLC (ug/m3): 28265

Pollutant: n-butyl acetate

TLV (mg/m3): 712.638

Morit

PTI A

Emissions Unit ID: **K001**

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Maximum Hourly Emission Rate (lbs/hr): 1.731

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 858.41

MAGLC (ug/m3): 16968

Pollutant: 2-butoxy ethanol

TLV (mg/m3): 96.66

Maximum Hourly Emission Rate (lbs/hr): 3.822

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1894.92

MAGLC (ug/m3): 2301

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- 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 previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

Moritz International
PTI A
Issued

Facility ID: 0370010048

Emissions Unit ID: **K001**

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, 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 deviation (excursion) reports for emissions unit K001 which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in paragraph B.1. of this permit;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph A.2.d. of this permit for emission units K001 and K002 combined;
 - c. any exceedances of the 26.25 tons VOC per rolling, 12-month period for K001 and K002 combined; and
 - d. any exceedances of the 621.4 lbs OC/month for cleanup material.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of a coating which does not comply with the 3.5 lbs VOC/gallon minus water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a volatile organic compound as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100 (s) for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

Morit

PTI A

Emissions Unit ID: **K001**

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4. The permittee shall submit annual written reports of any deviations (excursions) from the annual organic compound emission limitations from cleanup materials in section A.1. of this permit. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
26.25 lbs VOC/hr

Applicable Compliance Method

The hourly VOC limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum hourly coating usage of 7.5 gallons and a maximum VOC content of 3.5 pounds per gallon.

- b. **Emission Limitation**
621.4 lbs OC/month & 3.73 tons OC/yr from cleanup materials

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.3. of this permit.

- c. **Emission Limitation**
26.25 tons VOC per rolling 12-month period for emissions units K001 and K002 combined

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.2. of this permit.

- d. **Emission Limitation**

Morit

PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

9.09 tons per rolling 12-month period for any individual HAP and 23.06 tons per rolling 12-month period for any combination of HAPs for emission units K001 and K002 combined

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.4. of this permit.

- e. **Emission Limitation**
3.5 pounds of VOC per gallon excluding water and exempt solvents for an extreme performance coating

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.1. of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating(s).

F. Miscellaneous Requirements

1. The following terms A.1 through E.1 of this permit are federally enforceable.

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Miscellaneous metal parts coating line with dry filtration; spray booth #2	OAC rule 3745-31-05 (A) (3)	26.25 lbs volatile organic compounds (VOC)/hr from coating operations 621.4 lbs organic compounds (OC)/month & 3.73 tons OC/yr from cleanup operations (see A.2.c. and B.2.) See A.2.a
	OAC rule 3745-31-05 (C)	26.25 tons VOC per rolling 12-month period for emissions unit K001 and K002 combined (See A.2.b.) 9.09 tons per rolling 12-month period for any individual Hazardous Air Pollutant (HAP) and 23.06 tons per rolling 12-month period for any combination of HAPs for emission units K001 and K002 combined (See A.2.d.)
	OAC rule 3745-21-09 (U) (1) (C)	3.5 lbs of volatile organic compound per gallon excluding water and exempt solvents, for an extreme performance

Morit

PTI A

Issued: To be entered upon final issuance
coating

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with OAC rule 3745-21-09 (U) (1) (c) and OAC rule 3745-31-05 (C).
- 2.b** The emissions of VOC from emissions units K001 and K002 combined shall not exceed 26.25 tons per year based on a rolling, 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on coating usage restrictions (See B.1.) and VOC content requirements established by OAC rule 3745-21-09 (U) (1) (c). Federally enforceable VOC limitations are being established for the purpose of avoiding Title V applicability (See B.1).
- 2.c** The emission limitation for cleanup operations involve organic compounds which do not participate in atmospheric photochemical reactions (See B.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).
- 2.d** HAP emissions from emissions units K001 and K002 combined, shall not exceed 9.09 tons per year for any individual HAP and 23.06 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions.

Federally Enforceable HAP limitations are being established for purposes of avoiding MACT and Title V applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Month(s)	Individual HAP	Combined HAPs
1-1	2.27	5.77
1-2	2.89	7.34
1-3	3.51	8.91
1-4	4.13	10.48
1-5	4.75	12.05
1-6	5.37	13.62
1-7	5.99	15.19
1-8	6.61	16.76
1-9	7.23	18.33
1-10	7.85	19.90

Morit:

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

1-11	8.47	21.47
1-12	9.09	23.06

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

1. The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 15,000 gallons. The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rate. To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified below:

Month(s)	Gallon Usage
1-1	3750
1-2	4773
1-3	5796
1-4	6819
1-5	7842
1-6	8865
1-7	9888
1-8	10,911
1-9	11,934
1-10	12,957
1-11	13,980
1-12	15,000

After the first 12 calendar months of operation, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01, for cleanup operations in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for coating usage in this emissions unit:
 - a. the company name and identification for each coating employed;
 - b. the VOC content of each coating, as applied, in lbs/gallon;
 - c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the total VOC emission rate from all coatings employed, in lbs [summation of VOC emission rate ("b" x "d") for each individual coating].
2. In conjunction with the recordkeeping requirements specified in C.1. above, the permittee shall also record the following each month for emission units K001 and K002 combined:
 - a. for the first 12 months of operation, the cumulative total monthly emission rate of VOC, in tons per month; and,
 - b. after the first 12 months of operation, the total annual emissions of VOC, in tons, based on a rolling, 12-month summation.
3. The permittee shall collect and record the following each month for cleanup material usage in this emissions unit:
 - a. the company name and identification for each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100 (s);
 - c. the OC content of each cleanup material employed, in lbs/gallon;

Morit

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

- d. the number of gallons of each cleanup material employed;

Issued: To be entered upon final issuance

- e. the OC emission rate for each cleanup material employed, ("c" x "d"), in lbs/month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density
 - f. the total OC emission rate for all cleanup materials employed, (sum of "e"); and
 - g. the annual, year to date OC emissions, in tons, from all cleanup materials employed, (sum of "f") for each calendar month to date from January to December).
4. The permittee shall collect and record the following information regarding HAP emissions each month for emission unit K001 and K002 combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate ("b" x "c") for each individual coating/cleanup material], in lbs/month;
 - e. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, (sum of "d" for all HAPs) in lbs/month;
 - f. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
 - g. after the first 12 months of operation, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.
5. In addition to the above information, the permittee shall also collect and record the following information each month for emission units K001 and K002 combined:

- a. for the first 12 months of operation:
 - i. the cumulative gallon usage rate for each coating; and
 - ii. the total number of gallons of all coatings.
 - b. after the first 12 months of operation the annual number of gallons of all coatings based upon a rolling, 12-month summation of the monthly coating usage rates.
6. The permit to install for emission units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl n-amyl ketone
TLV (mg/m3): 233.497
Maximum Hourly Emission Rate (lbs/hr): 10.727
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5318.52
MAGLC (ug/m3): 5559

Pollutant: Ethylbenzene
TLV (mg/m3): 434.192
Maximum Hourly Emission Rate (lbs/hr): 1.533
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 760.07
MAGLC (ug/m3): 10338

Pollutant: xylene
TLV (mg/m3): 434.192
Maximum Hourly Emission Rate (lbs/hr): 8.149
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4040.37
MAGLC (ug/m3): 10338

Pollutant: MIBK

Morit

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

TLV (mg/m³): 204.826

Maximum Hourly Emission Rate (lbs/hr): 9.094

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 4508.83

MAGLC (ug/m³): 4877

Pollutant: acetone

TLV (mg/m³): 11871.17

Maximum Hourly Emission Rate (lbs/hr): 18.070

Morit

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 8959.22
MAGLC (ug/m3): 28265

Pollutant: n-butyl acetate
TLV (mg/m3): 712.638
Maximum Hourly Emission Rate (lbs/hr): 1.731
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5318.52
MAGLC (ug/m3): 858.41

Pollutant: 2-butoxy ethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 3.822
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1894.92
MAGLC (ug/m3): 2301

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- 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 previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

Morit

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, 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 deviation (excursion) reports for emissions unit K002 which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in paragraph B.1. of this permit;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph A.2.d. of this permit for emission units K001 and K002 combined;
 - c. any exceedances of the 26.25 tons VOC per rolling, 12-month period for K001 and K002 combined; and
 - d. any exceedances of the 621.4 lbs OC/month for cleanup material.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air

agency) in writing of any monthly record showing the use of a coating which does not comply with the 3.5 lbs VOC/gallon minus water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a volatile organic compound as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100 (s) for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.
4. The permittee shall submit annual written reports of any deviations (excursions) from the annual organic compound emission limitations from cleanup materials in section A.1. of this permit. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
26.25 lbs VOC/hr

Applicable Compliance Method

The hourly VOC limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum hourly coating usage of 7.5 gallons and a maximum VOC content of 3.5 pounds per gallon.

- b. **Emission Limitation**
621.4 lbs OC/month & 3.73 tons OC/yr from cleanup materials

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.3. of this permit.

- c. **Emission Limitation**

Morit

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

26.25 tons VOC per rolling 12-month period for emissions units K001 and K002 combined

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.2. of this permit.

d. **Emission Limitation**

9.09 tons per rolling 12-month period for any individual HAP and 23.06 tons per rolling 12-month period for any combination of HAPs for emission units K001 and K002 combined

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.4. of this permit.

- e. **Emission Limitation**
3.5 pounds of VOC per gallon excluding water and exempt solvents for an extreme performance coating

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.1. of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating(s).

F. Miscellaneous Requirements

1. The following terms A.1 through E.1 of this permit are federally enforceable.