



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
VAN WERT COUNTY
Application No: 03-01368

DATE: 1/25/2001

VP Buildings
John Wilson
1202 Industrial Avenue
Van Wert, OH 45891

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

You are hereby notified that this action 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 Directors 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,

A handwritten signature in cursive script that reads "Thomas G. Rigo".

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/25/2001
Effective Date: 1/25/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-01368

Application Number: **03-01368**
APS Premise Number: **0381020153**
Permit Fee: **\$0**
Name of Facility: **VP Buildings**
Person to Contact: **John Wilson**
Address: **1202 Industrial Avenue
Van Wert, OH 45891**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1202 Industrial Avenue
Van Wert, OHIO**

Description of modification:
Administrative modification for PTI 03-1368 issued on August 12, 1998.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

Facility Name: **V-P Buildings**
Application Number: **03-1368**
Date: **January 25, 2001**

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

5

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

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

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>
			3745-21-09 (U)1(d)
K004	Solid web spray booth	Compliance with the "Air Toxics Policy" and the terms and conditions of this permit	3745-31-05
K005	Heavy fab spray booth		3745-21-09 (U)1 (d)
		Compliance with the "Air Toxics Policy" and the terms and conditions of this permit	3745-31-05

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Permit Allowable Emissions and/or Control/Usage Requirements	lon of coating minus water and exempt solvents			
17.5 pounds OC/hour and 39.0 TPY	17.5 pounds OC/hour and 39.0 TPY			
0.55 pound particulate matter PM/hour and 2.4 TPY	0.55 pound PM/hour and 2.4 TPY			
17.5 pounds OC/hour and 39.0 TPY	0 percent opacity as a six minute average			
0.55 pound particulate matter PM/hour and 2.4 TPY	3.5 pounds VOC/gallon of coating minus water and exempt solvents			
0 percent opacity as a six minute average				
3.5 pounds VOC/gal				

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PE	4.8
VOC	78.0

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge**

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

Road, Bowling Green, OH 43402.

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

AIR POLLUTION NUISANCES PROHIBITED

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

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

INTRODUCTION

The purpose of this permit is to allow VP Buildings, located in Van Wert, Ohio to install two new paint spray booths, emission units K004 & K005.

A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS

1. The permittee shall employ a dry exhaust filtration system while emission units K004 & K005 are in operation.

B. OPERATIONAL RESTRICTIONS

1. The permittee shall not employ coatings that exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
2. This permit allows for the use of the coatings and cleanup materials specified by the permittee in PTI number 03-01368. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the coating formulation data

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1-hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

Pollutant: 2-butoxyethanol

TLV: 121 mg/m³

Maximum Hourly Emission Rate: 35.0 lbs/hr

Predicted 1-hour Maximum Concentration at or Beyond the Fence Line: 1.114 mg/m³

Maximum Achievable Ground Level Concentration: 2.881 mg/m³

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-10945 and the operating permit:

- a. any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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. any change to the emissions unit or its exhaust parameters (e.g. increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase of any MAGLC specified in the above table; and,
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

C. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

1. The permittee shall collect and record the following information each month for each emission unit in conjunction with the application of coating materials in K004 and K005:
 - a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied;
 - c. the VOC content of each coating, as applied;

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

- d. the number of gallons of each coating employed;
- e. the total OC emissions from each coating employed (b x d);
- f. the total OC emissions from all coatings employed, (summation of e); and,
- g. the total cumulative OC emissions for the calendar year to date (summation of e from January through December).

D. REPORTING REQUIREMENTS

1. 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 Ohio EPA, Northwest District Office. 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.)
2. The compliance status of the emissions units shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
3. The actual annual emissions data for the emissions units shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

E. TESTING REQUIREMENTS

1. Compliance with the emission limitations in Section A of these Additional Special Terms and Conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

3.5 lbs VOC/gallon of coating excluding water and exempt solvents

Applicable Compliance Method

Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of the coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

b. Emission Limitation

<u>Emissions Unit</u>	<u>Emission Limitation</u>
K004	17.5 lbs OC/hr
K005	17.5 lbs OC/hr

Applicable Compliance Method

The hourly OC limits are based on each emission unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

c. Emission Limitation

<u>Emissions Unit</u>	<u>Emission Limitation</u>
K004	39.0 tons OC/yr
K005	39.0 tons OC/yr

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section C above.

d. Emission Limitation

<u>Emissions Unit</u>	<u>Emission Limitation</u>
K004	0.55 lb PM/hr
K005	0.55 lb PM/hr

Applicable Compliance Method

The permittee may calculate the actual emission rates utilizing the following equation:

Facility Name: **V-P Buildings**

Application Number: **03-1368**

Date: **January 25, 2001**

$E =$ the maximum coating solids usage rate in pounds per hour $\times (1-TE) \times (1-CE)$

where:

$E =$ the particulate matter emissions rate (lbs/hr)

$TE =$ the transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

$CE =$ the control efficiency of the control equipment

If required, compliance with the PE limit shall be determined in accordance with the test method and procedures in EPA Test Method 5, as found in 40 CFR Part 60, Appendix A.

e. Emission Limitation

<u>Emissions Unit</u>	<u>Emission Limitation</u>
K004	2.4 tons PM/yr
K005	2.4 tons PM/yr

Applicable Compliance Method

The permittee may calculate the actual annual PE emission rates by multiplying the hourly emission rates calculated in accordance with E.1.(e) above by each emission units annual hours of operation, and divide by 2000 lbs/ton.

f. Emission Limitation

0 percent opacity as a six minute average

Applicable Compliance Method

Compliance with the visible emission limitations shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

F. MISCELLANEOUS REQUIREMENTS

None.