



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
WOOD COUNTY**

**CERTIFIED MAIL**

**Application No: 03-13444**

**DATE: 6/21/00**

Modine Manufacturing Company  
Ron Nixon  
615 Bierley Road  
Pemberville, OH

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 **\$200** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 03-13444**

Application Number: 03-13444  
APS Premise Number: 0387000031  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Modine Manufacturing Company  
Person to Contact: Ron Nixon  
Address: 615 Bierley Road  
Pemberville, OH 43450

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

**615 Bierley Road  
Pemberville, Ohio**

Description of proposed emissions unit(s):

**Modification of paint 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

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Director

**Modine Manufacturing Company**

**Facility ID: 0387000031**

**PTI Application: 03-13444**

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

**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

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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

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lead to such sanctions

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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 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

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permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(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	24.94

**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>
Radiator Coating Booth w/water wash	OAC rule 3745-31-05(A)(3)	16.4 lbs VOC/hr The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09 (U)(1)(d).
	OAC rule 3745-31-05(D)	24.94 tons VOC/rolling 12-month period, based on VOC content and gallon usage restrictions (See B.2. and 3.)
	OAC Rule 3745-21-09 (U)(1)(d)	3.5 lbs VOC per gallon of coating excluding water and exempt solvents

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. The maximum VOC contents of the coatings/cleanup materials employed in emissions K002 shall not exceed the following:
  - a. 3.5 lbs VOC/gallon as applied for all coating materials.
  - b. 6.9 lbs VOC/gallon for all cleanup materials, as employed.
2. The maximum annual coating/cleanup material usage for emissions unit K002 shall not exceed the following:

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Emissions Unit ID: K002

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- a. 60,000 gallons of coatings.
- b. 100 gallons of cleanup material.

The annual coating/cleanup material usage limitations shall be based upon a rolling, 12-month summation of the coating/cleanup material input rates.

Emission unit K002 is an existing emission unit and, as such, has existing 12-month summation of the monthly input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

3. 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 K002. 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: Butyl Cellosolve

TLV (ug/m3): 121.0

Maximum Hourly Emission Rate (lbs/hr): 16.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 178.0

MAGLC (ug/m3): 2880.9

- \* For the purposes of this model, the worst case air toxic was assumed to be 100% of the total emission.

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;

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Emissions Unit ID: K002

- 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.
4. 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.

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

1. The permittee shall collect and record the following information each month for emissions unit K002 :
- a. The name and identification number of each coating/cleanup material, as applied.
  - b. The VOC content of each coating/cleanup material, as applied, in pounds per gallon.
  - c. The number of gallons of each coating material employed.
  - d. The number of gallons of each cleanup material employed.
  - e. The total gallons of all coating materials employed (summation of c).
  - f. The total gallons of all cleanup material employed (summation of d).
  - g. Beginning the first month after the first 12 calendar months of operation, the rolling 12-month summation of the monthly coating usage and monthly cleanup material usages.

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2. The permittee shall (in conjunction with the information required in C.1.) collect and record the following information each month for purposes of determining VOC emissions for emissions unit K002 :
  - a. The rolling, 12-month VOC emissions, in tons.
3. The permittee shall collect and record the following information each month for K002:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
4. 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 deviation (excursion) reports which identify all exceedances of the following:
  - a. The annual gallon usage restrictions and emission limitations from emissions unit K002 per rolling 12-month period;
  - b. The VOC per gallon content restrictions.
  - c. 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 noncomplying coatings. 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.

The deviation reports shall be submitted in accordance with Part I-General Terms and Conditions.

**E. Testing Requirements**

**Modine Manufacturing Company**

PTI Application 02-12-11

**Issue****Facility ID: 0387000031**

Emissions Unit ID: K002

1. Compliance Methods Requirements:a. Emission Limitation:

3.5 lbs VOC/gallon excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of coatings.

b. Emission Limitation:

24.94 tons VOC per rolling 12-month period

Applicable Compliance Method:

The recordkeeping requirements in section C.2. of this permit shall be used to determine compliance with the above limit. The rolling 12-month summation of the monthly coating usage and monthly cleanup material usages is calculated by multiplying the VOC content of each coating/cleanup material, as applied, in pounds per gallon by the total gallons of each coating/cleanup material employed. Sum the products for all VOC emissions from each coating and cleanup material for the month. Then sum the last 12 months of VOC emissions.

c. Emission Limitation

16.4 lbs VOC/hr

Applicable Compliance Method

The hourly VOC emission limitations are based on the emission units' potential to emit (\*). Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

(\*) The potential to emit for this emissions unit was based on a maximum VOC content of 0.82 lbs VOC/gallon and a maximum hourly usage rate of 20.0 gallon per hour.

**F. Miscellaneous Requirements**

None

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Emissions Unit ID: K002

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13444 Facility ID: 0387000031

FACILITY NAME Modine Manufacturing Company

FACILITY DESCRIPTION Modification of paint spray booth CITY/TWP Pemberville

SIC CODE 3714 SCC CODE 4-02-025-1 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Radiator Coating Line

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	16.4 lbs/hr	24.94	16.4 lbs/hr	24.94
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of water wash, and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/K

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Butyl Cellosolve