

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install: **03-17204**

**A. Source Description**

Reed Air Products Group, located in Bradner, Ohio (Wood County), is a division of Mestek, Inc. (Westfield, MA). The company coats/paints metal architectural louvers for air ventilation systems. The purpose of this PTI is to permit the installation of two additional paint booths at the facility, and incorporate them into facility-wide synthetic minor emissions limits for Hazardous Air Pollutants (HAPs), previously established for K001 in PTI #03-11276. Emissions unit K001 will also continue to synthetic minor restrictions for VOC to avoid Title V applicability.

**B. Facility Emissions and Attainment Status**

Without the synthetic minor, VOC emissions from K001 would be greater than 100 TPY, and individual HAPs greater than 10 TPY and combined HAPs greater than 25 TPY for the facility. With the synthetic minor, VOC emissions for the facility will be 41.6 TPY, and HAPs will be less than 10 and 25. Wood County is currently not in attainment for the 8-hour ozone standard, however, redesignation has been requested by Ohio EPA, based on data collected for the county.

**C. Source Emissions**

The existing paint line, emissions unit K001, is being re-permitted in order to incorporate the two new emissions units into the facility-wide HAPs emissions limits. The current PTI application (03-17204) also incorporates several other changes for K001. These are an increase in the hourly emissions limitation for VOCs due to an increase in the amount of paint that can be used per hour, and a decrease in the annual VOC emissions limit for the facility, due to a decrease in the amount of paint to be used per year, as requested by the company. Emissions unit K001 is limited by VOC content restrictions from OAC 3745-21-09(U) and gallon usage restrictions established in the operational restrictions section of the PTI.

Emissions units K002 and K003 are to be installed after issuance of this PTI. Emissions unit K002 is subject to OAC 3745-21-09(U)(2)(e)(iii) which does not have a limit on VOC content of the paint used, but instead limits the quantity of coating used to less than 10 gallons of coating material per day. Emissions unit K003 is subject to OAC 3745-21-09(U)(1)(d) which limits coating used to 3.5 lbs VOC/gallon, excluding water and exempt solvents.

**D. Conclusion**

With the synthetic minor HAP restrictions across all three emissions units, and synthetic minor VOC restrictions for K001 in place, the facility will not be subject to Title V or MACT regulations. The company's emissions are subject to air toxics review however. Air toxics are being re-evaluated for K001, due to the increase in the hourly VOC emissions rate, and are also being evaluated for emissions from K002 and K003.



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**Application No:** 03-17204

**Fac ID:** 0387000107

**DATE:** 2/20/2007

Reed Air Products Group  
Todd Wightman  
120 Pilm Street  
Bradner, OH 43406

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, 43216-1049.

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 **\$600** 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.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NWDO

Toledo Metro Area Council of Gov.

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**WOOD COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17204 FOR AN AIR CONTAMINANT SOURCE FOR  
Reed Air Products Group**

On 2/20/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Reed Air Products Group**, located at **120 South Plin Street, Bradner, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17204:

**Synthetic minor application to modify existing coating operations and adding new coating operation.**

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 03-17204**

Application Number: 03-17204  
Facility ID: 0387000107  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Reed Air Products Group  
Person to Contact: Todd Wightman  
Address: 120 Piln Street  
Bradner, OH 43406

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**120 South Plin Street  
Bradner, Ohio**

Description of proposed emissions unit(s):  
**Synthetic minor application to modify existing coating operations and adding new coating operation.**

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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Chris Korleski  
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 (i.e., postmarked) quarterly 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,

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PTI Application: 03-17204

Facility ID: 0387000107

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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

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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**

**Reed Air Products Group**  
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This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) 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>
Volatile Organic Compounds (VOC)	41.6
Individual Hazardous Air Pollutants (HAPs)	9.9
Combined HAPs	24.9

**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.

**Operations, Property, and/or Equipment - (K001) - metal architectural louver coating line (modification to combine synthetic minor limits for HAPs with two new emissions units), modification to PTI no. 03-1276**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	25.67 lbs volatile organic compounds (VOC)/hr, from the coating operations  VOC emissions from the cleanup operations (for emissions units K001, K002, and K003, combined) shall not exceed 360.0 lbs OC/month and 2.16 tons per year  See A.2.a, A.2.b, and A.2.c.
OAC 3745-31-05(C)	21.6 tons of VOC per rolling, 12-month period, from the coating operations [for emissions unit K001] (See A.2.d.i, B.1 and B.2.)  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, and K003, combined] (See A.2.d.ii.)
OAC rule 3745-21-09(U)(1)(h)	6.2 lbs VOC/gallon, excluding water and exempt solvents, for all high performance architectural aluminum coatings
OAC rule 3745-21-09(U)(1)(d)	3.5 lbs VOC/gallon, excluding water and exempt solvents, for all other coatings
OAC rule 3745-17-11(B)	0.551 pound particulate emission (PE) per hour
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.

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- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(e), OAC rule 3745-21-09(U)(1)(h), and OAC 3745-31-05(C).
- 2.c** The hourly emission limitation represents the potential to emit of the emissions unit. Therefore, no monitoring, record keeping, and/or deviation reporting is necessary to ensure compliance with this limitation.
- 2.d** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 21.6 tons VOC per rolling, 12-month period based on coating usage restrictions (See B.1), and coating VOC content restrictions (See B.2), for emission units K001, K002, and K003, combined .
  - ii. Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88

Emissions Unit ID: **K001**

1-12	9.90	24.90
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After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

## B. Operational Restrictions

1. The maximum annual coating usage rate for emissions unit K001 shall not exceed 6,968 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	580.67
1-2	1161.34
1-3	1742.01
1-4	2322.68
1-5	2903.35
1-6	3484.02
1-7	4064.69
1-8	4645.36
1-9	5226.03
1-10	5806.70
1-11	6387.37
1-12	6968.00

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

2. The permittee shall use only coatings which comply with the applicable emissions limitations in OAC rule 3745-21-09(U)(1)(e) and OAC rule 3745-21-09(U)(1)(h) in emissions unit K001, on an "as applied" basis.
3. All coatings employed in this emissions unit which are not classified as "high performance architectural aluminum coatings" (defined in OAC rule 3745-21-01) shall not be dried at temperatures exceeding 250 degrees Fahrenheit.

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4. The permittee shall operate the dry filtration system (styrene particulates filter pads) whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each month for all the coatings employed in emissions unit K001:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed (summation of C.1.c for all coatings);
  - e. the rolling, 12-month coatings usage rate, in gallons;
  - f. the VOC emission rate for each coating employed (C.1.b x C.1.c), in pounds;
  - g. the total VOC emission rate for all the coatings employed (summation of C.1.f for all coatings.), in pounds or tons;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - i. beginning the first month after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rate, in tons.
  - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
  - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following each month for the cleanup

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operations in emissions units K001, K002, and K003, combined:

- a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total VOC emissions from all the cleanup materials employed (summation of C.2.d for all cleanup materials) in pounds or tons; and
  - f. the annual year-to-date VOC emissions from the cleanup operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).
3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, and K003, combined:
- a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in lbs;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and

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- h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
4. The permittee shall record the temperature of the cure oven associated with this coating line when employing coatings in this emissions unit which are not classified as "high performance architectural aluminum coatings" (defined in OAC rule 3745-21-01).
5. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the 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 this emissions unit 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: xylene

TLV (mg/m<sup>3</sup>): 434.0

Maximum Hourly Emission Rate (lbs/hr): 7.62

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 3,747.0MAGLC (ug/m<sup>3</sup>): 10,333.0

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;

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- 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.).
6. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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 evaluations 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.
7. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

**D. Reporting Requirements**

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceeded the 6.2 lbs of VOC/gallon of architectural coatings, or 3.50 lbs of VOC/gallon of other coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the

Emissions Unit ID: **K001**

calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month VOC emission limitation of 21.6 tons (from the coating operations for emissions unit K001).
  - b. All exceedances of the monthly VOC emission limitation of 360.0 pounds (from the cleanup operations for emissions units K001, K002 and K003, combined).
  - c. All exceedances of the rolling, 12-month coatings usage restriction of 6,968 gallons (for emissions unit K001).
  - d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage restrictions specified in section B.1.
  - e. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K001, K002, and K003, combined).
  - f. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, and K003, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit an annual report that summarizes the actual annual VOC emissions from the cleanup operations (for emissions units K001, K002, and K003, combined) and the actual annual VOC emissions from the coating operations (for emissions unit K001). This reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any monthly record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

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5. The permittee shall notify the Northwest District Office in writing of any monthly record of all instances when any coating which was not classified as "high performance architectural aluminum coatings" (as defined in OAC rule 3745-21-01) was dried at temperatures exceeding 250 degrees Fahrenheit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

**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**  
25.67 pounds VOC/hr

**Applicable Compliance Method**

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (4.14 gallons per hour) by the maximum VOC content of all the coatings (6.2 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. **Emission Limitation**  
21.6 tons of VOC per rolling, 12-month period, from the coating operations (for emission unit K001)

**Applicable Compliance Method**

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements as specified in section C.1 of this permit.

- c. **Emission Limitation**  
VOC emissions from the cleanup operations (for emissions units K001, K002, and K003, combined) shall not exceed 360.0 lbs OC/month and 2.16 tons per year.

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

Compliance with the monthly and annual allowable emission limitations shall be based on the record keeping requirements as specified in section C.2 of this permit.

Also, as long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was established by multiplying the monthly limitation by 12, and then dividing by 2000 lbs/ton).

d. **Emission Limitation**

Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

**Applicable Compliance Method**

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

e. **Emission Limitation:**

6.2 pounds VOC per gallon of coating, as applied

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**Applicable Compliance Method:**

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

f. **Emission Limitation:**

3.5 pounds VOC per gallon of coating, as applied

**Applicable Compliance Method:**

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

g. **Emission Limitation:**

0.551 pound PE per hour

**Applicable Compliance Method:**

To determine the actual worst case PE rate (E), the following equation shall be used for the coating operation:

$E = \text{PE rate (lbs/hr)}$

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

TE = 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 = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

h. **Emission Limitation:**

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule

**Applicable Compliance Method:**

Compliance with the visible PE shall be determine in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content

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of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. All the terms and conditions for this emissions unit are federally enforceable, except the following: Sections C.5 and C.6.
2. The facility shall submit a revised Hazardous Air Pollutant (HAP) summary, within 30 days of changing any coating material usage at the facility that results in an increase in HAP emissions, whether or not there is an increase in overall VOC emissions.

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**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.

**Operations, Property, and/or Equipment - (K002) - manual spray paint booth A, with particulate filters**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	41.1 lbs VOC/day; 7.5 tons VOC/yr, from the coating operations  VOC emissions from the cleanup operations for emissions units K001, K002, and K003, combined, shall not exceed 360.0 lbs OC/month and 2.16 tons per year  See A.2.a and A.2.b.
OAC rule 3745-31-05(C)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, and K003, combined] (See A.2.c.i.)
OAC rule 3745-21-09(U)(2)(e)(iii)	less than 10 gallons of coating material per day
OAC rule 3745-17-11(B)	0.551 pound particulate emission (PE) per hour
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the terms and conditions of this permit.
- 2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii), and OAC rule 3745-31-05(C).
- 2.c This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control

Emissions Unit ID: **K002**

Technology (MACT) regulations:

- i. Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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

**B. Operational Restrictions**

None.

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

1. The permittee shall collect and record the following information each day for all the coatings employed in emissions unit K002:
  - a. the name and identification number of each coating employed;

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- b. the VOC content of each coating, as applied, in pounds per gallon;
- c. the number of gallons of each coating employed;
- d. the total number of gallons of all the coatings employed (summation of C.1.c for all coatings);
- d. the VOC emission rate for each coating employed (C.1.b x C.1.c), in pounds;
- e. the total VOC emission rate for all the coatings employed (summation of C.1.d for all coatings.), in pounds; and
- f. the annual year-to-date VOC emissions from the coating operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- 2. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, and K003, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total VOC emissions from all the cleanup materials employed (summation of C.2.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).
- 3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, and K003, combined:

Emissions Unit ID: **K002**

- a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in lbs;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
4. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of the 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 this emissions unit 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: xylene

TLV (mg/m<sup>3</sup>): 434.0

Maximum Hourly Emission Rate (lbs/hr): 2.62

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 349.9

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MAGLC (ug/m3): 10,333.0

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.).
5. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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 evaluations 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.)

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- 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 notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of greater than 10 gallons of coating materials per day in emissions unit K002. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the monthly VOC emission limitation of 360.0 pounds, from the cleanup operations (for emissions units K001, K002 and K003, combined).
  - b. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K001, K002, and K003, combined).
  - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i (for emissions units K001, K002, and K003, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the following information:
  - a. the actual annual VOC emissions, from the coating operations (for emissions units K002); and
  - b. the actual annual VOC emissions, from the cleanup operations (for emissions units K001, K002, and K003, combined).

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These reports shall be submitted 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 Limitations**

- a. 41.1 lbs VOC/day; 7.5 tons VOC/yr, from coating operations

- Applicable Compliance Method**

- Compliance with the monthly and annual allowable VOC emission limitations shall be based on the record keeping requirements established in section C.1 of this permit.

- Also, as long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was established by multiplying the monthly limitation by 365, and then dividing by 2000 lbs/ton).

- b. **Emission Limitations**

- b. VOC emissions from cleanup operations (for emissions units K001, K002, and K003, combined) shall not exceed 360.0 lbs OC/month and 2.16 tons per year

- Applicable Compliance Method**

- Compliance with the monthly and annual limitations shall be based on the record keeping requirements established in section C.2 of this permit.

- Also, as long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was established by multiplying the monthly limitation by 12, and then dividing by 2000 lbs/ton).

- c. **Emission Limitation**

- c. Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

- Applicable Compliance Method**

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Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- d. **Emission Limitation**  
less than 10 gallons of coating materials per day

**Applicable Compliance Method**

Compliance with daily gallon usage restriction shall be based on the record keeping requirements established in section C.1 of this permit.

- e. **Emission Limitation:**  
0.551 pound PE per hour

**Applicable Compliance Method:**

To determine the actual worst case PE rate (E), the following equation shall be used for the coating operation:

$$E = \text{PE rate (lbs/hr)}$$

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

TE = 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 = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- f. **Emission Limitation:**  
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule

**Applicable Compliance Method:**

Compliance with the visible PE shall be determine in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. All the terms and conditions for this emissions unit are federally enforceable, except the following: Sections C.4 and C.5.
2. The facility shall submit a revised Hazardous Air Pollutant (HAP) summary, within 30 days of changing any coating material usage at the facility that results in an increase in HAP emissions, whether or not there is an increase in overall VOC emissions.

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**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.

**Operations, Property, and/or Equipment - (K003) - manual spray paint booth B, with particulate filters**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	2.36 lbs VOC/hr, from the coating operations; 10.34 tons VOC/yr  VOC emissions from the cleanup operations (for emissions units K001, K002, and K003, combined) shall not exceed 360.0 lbs OC/month and 2.16 tons per year  See A.2.a, A.2.b, and A.2.c.
OAC rule 3745-31-05(C)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, and K003, combined] (See A.2.d.i.)
OAC rule 3745-21-09(U)(1)(d)	3.5 lbs VOC/gallon, excluding water and exempt solvents, for all coatings
OAC rule 3745-17-11(B)	0.551 pound particulate emission (PE) per hour
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a** Best Available Technology (BAT) for this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-31-05(C).
- 2.c** The hourly emission limitation represents the potential to emit of the emissions

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unit. Therefore, no monitoring, record keeping, and/or deviation reporting is necessary to ensure compliance with this limitation.

**2.d** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

- i. Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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

**B. Operational Restrictions**

1. The permittee shall use only coatings which comply with the applicable emission limitations in OAC rule 3745-21-09(U)(1)(d) in emissions unit K003, on an "as applied" basis.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for all the coatings employed in emissions unit K003:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the VOC emission rate for each coating employed (C.1.b x C.1.c), in pounds;
  - e. the total VOC emission rate for all the coatings employed (summation of C.1.d for all coatings.), in pounds;
  - f. the annual year-to-date VOC emissions from the coating operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, and K003, combined:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the VOC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total VOC emissions from all the cleanup materials employed (summation of

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- C.2.d for all cleanup materials) in pounds or tons; and
- f. the annual year-to-date VOC emissions from the cleanup operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).
3. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, and K003, combined:
    - a. the company identification of each coating and cleanup material employed;
    - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
    - c. the number of gallons of each coating and cleanup material employed;
    - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
    - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in lbs;
    - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in lbs;
    - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
    - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  4. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of the 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 this emissions unit using data from the permit to install application and the SCREEN

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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: xylene

TLV (mg/m<sup>3</sup>): 434.0

Maximum Hourly Emission Rate (lbs/hr): 2.62

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 349.9

MAGLC (ug/m<sup>3</sup>): 10,333.0

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.).
5. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be

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required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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 evaluations 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 notify the Northwest District Office in writing of any daily record showing the use of noncomplying coatings (i.e., coatings that exceeded 3.50 lbs of VOC/gallon of other coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the monthly VOC emission limitation of 360.0 pounds (from the cleanup operations for emissions units K001, K002 and K003, combined).
  - b. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K001, K002, and K003, combined).
  - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii (for emissions units K001, K002, and K003, combined).

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These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports that summarizes the following information:
  - a. the actual annual VOC emissions, from the coating operations (for emissions units K003); and
  - b. the actual annual VOC emissions, from the cleanup operations (for emissions units K001, K002, and K003, combined).

These reports shall be submitted 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 Limitations**

2.36 lbs VOC/hr, from the coating operations; 10.34 tons VOC/yr

**Applicable Compliance Method**

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.675 gallon per hour) by the maximum VOC content of all the coatings (3.48 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

Compliance with the annual allowable emissions limitation shall be based on the record keeping requirements as specified in section C.1 of this permit.

Also, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was established by multiplying the monthly limitation by 8760, and then dividing by 2000 lbs/ton).

- c. **Emission Limitation**

VOC emissions, from the cleanup operations (for emissions units K001, K002, and K003, combined) shall not exceed 360.0 lbs OC/month and 2.16 tons per year.

**Applicable Compliance Method**

Compliance with the monthly and annual allowable emissions limitations shall be based on the record keeping requirements established in section C.2 of this permit.

Also, as long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was established by multiplying the monthly limitation by 12, and then dividing by 2000 lbs/ton).

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- d. **Emission Limitation**  
Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

**Applicable Compliance Method**

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- e. **Emission Limitation:**  
3.5 pounds VOC per gallon of coating, as applied

**Applicable Compliance Method:**

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit.

- f. **Emission Limitation:**  
0.551 pound PE per hour

**Applicable Compliance Method:**

To determine the actual worst case PE rate (E), the following equation shall be used for the coating operation:

$$E = \text{PE rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour (1-TE) x (1-CE)}$$

TE = 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 = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- g. **Emission Limitation:**  
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule

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**Applicable Compliance Method:**

Compliance with the visible PE shall be determine in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

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**F. Miscellaneous Requirements**

1. All the terms and conditions for this emissions unit are federally enforceable, except the following: Sections C.4 and C.5.
2. The facility shall submit a revised Hazardous Air Pollutant (HAP) summary, within 30 days of changing any coating material usage at the facility that results in an increase in HAP emissions, whether or not there is an increase in overall VOC emissions.