

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

Permit To Install #03-13757

A. Source Description

D.S. Brown Company is a manufacturer of expansion joint rails and bearing plates. The company has proposed to modify two existing metal parts coating lines to increase current allowable emission limitations, as well as to install two new metal parts coating lines, both of which will be restricted to employing less than 10 gallons of coating per day.

B. Facility Emissions and Attainment Status

D.S. Brown is located in Wood County. Wood County is considered attainment for all criteria pollutants. D.S. Brown currently has a synthetic minor permit for emissions units K001 and K002 to restrict the potential to emit VOCs below Title V permitting thresholds. The company is now requesting further federally enforceable limitations so as to maintain their non-Title V status.

C. Source Emissions

D.S. Brown Company has requested federally enforceable limitations to restrict the potential to emit hazardous air pollutants (HAPs) from emissions unit K001 - K004 to below 10 tons per year for a single HAP and 25 tons per year for any combination of HAPs. By restricting annual emissions of HAPs, resulting VOC emissions will be limited to 25.77 tons per year.

D. Conclusion

Restricting annual HAP emissions below the 10 and 25 tons per year thresholds will prevent the company from being subject to Title V permitting requirements, and will subsequently limit VOC emissions below 100 tons per year. Record keeping and excursion reports will be required to ensure compliance.

Street Address:

~~State of Ohio Environmental Protection Agency~~
~~Lazarus Gov. Center~~



~~TELE: (614) 644-3020 FAX: (614) 644-2329~~

Mailing Address:

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
WOOD COUNTY
Application No: 03-13757**

CERTIFIED MAIL

DATE: 6/18/2002

The D.S. Brown Company
Gina Rejent
300 E. Cherry Street
North Baltimore, OH 45872

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 **\$1000** 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 Toledo Metro. Area Council of Gov. IN MI



**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 03-13757

Application Number: 03-13757
APS Premise Number: 0387000118
Permit Fee: **To be entered upon final issuance**
Name of Facility: The D.S. Brown Company
Person to Contact: Gina Rejent
Address: 300 E. Cherry Street
North Baltimore, OH 45872

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

**300 E. Cherry Street
North Baltimore, Ohio**

Description of proposed emissions unit(s):

Modification of Two Existing Coating Lines to Increase Emission Limits and Installation of Two New Coating Lines (Less than 10 Gallons per Day).

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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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 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 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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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

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

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	25.94

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>
K001 - North Coating Area with Dry Filtration (Manual Spray Coating of Steel Bearing Plates - Modification of PTI #03-9642 issued 10/30/96 to remove daily coating usage restriction)	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001 - K004 shall not exceed 10 tons per year for any individual HAP or 25 tons per year for all HAPs combined (See A.2.a)
	OAC rule 3745-31-05 (A)(3)	3.50 lbs of OC/hour from coating; 8.75 tons of OC /year from coating 58.33 lbs of OC/mth from cleanup; 0.35 tons of OC/year from cleanup
	OAC rule 3745-21-09 (U)(1)(c)	See A.2.b 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding Title V:

Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, and K004 shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 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:

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Facility ID: 0387000118

Emissions Unit ID: K001

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Emissions Unit ID: **K001**

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	<25.00

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.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(c).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), in lbs/gal;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the number of gallons of each coating employed;

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- e. the OC emission rate for each coating (c x d);
 - f. the total OC emission rate for all coatings (summation of e), in pounds or tons;
 - g. the annual year to date OC emissions from coating usage, in tons per year (summation of e for each calendar month to date from January to December).
2. The permittee shall collect and record the following each month for cleanup material usage:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed (b x c);
 - e. the total OC emissions from all cleanup materials employed (summation of d), in pounds or tons;
 - f. the annual year to date OC emissions from cleanup material usage, in tons per year (summation of e for each calendar month to date from January to December).

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

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

3. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material, 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, (b) x (c) for each individual HAP, in lbs/month;

The 1

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Emissions Unit ID: **K001**

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- e. the total emission rate for each individual HAP from all coatings and cleanup materials employed (summation of d for each individual HAP), in lbs/month;
- f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed (summation of e for all HAPs), in lbs/month;
- g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

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

- 4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 (ug/m³): 434,192

Maximum Hourly Emission Rate (lbs/hr): 2.43

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 101.80

MAGLC (ug/m³): 10,338.00

- 5. 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

Emissions Unit ID: **K001**

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 composition 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(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts 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 monthly record showing the use of noncomplying coatings. 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 calendar month.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the general terms and conditions of this permit.
3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of

The D.S. Brown Company
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Issue

Facility ID: 0387000118

Emissions Unit ID: **K001**

the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

The 1

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Emissions Unit ID: **K001**

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E. Testing Requirements

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

- a. Emission Limitation

- a. 3.50 lbs of OC/hour (from the use of coatings)

- Applicable Compliance Method

- The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

- * The potential to emit is based on a maximum coating usage rate of 1.0 gallon per hour and a maximum OC content of 3.50 pounds per gallon.

- b. Emission Limitation

- b. 8.75 tons of OC/year (from the use of coatings)

- Applicable Compliance Method

- Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.1.

- c. Emission Limitation

- c. 58.33 lbs of OC/month (from the use of cleanup materials)

- Applicable Compliance Method

- Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

- d. Emission Limitation

- d. 0.35 tons of OC/year (from the use of cleanup materials)

- Applicable Compliance Method

- Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

- e. Emission Limitation

- e. Not to exceed 10 tons per rolling 12-month period of any individual HAP or 25 tons per rolling 12-month period of any combination of HAPs (from emissions unit K001-K004 combined)

The 1

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Issued: To be entered upon final issuance

Emissions Unit ID: **K001**

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section C.3.

f.

Emission Limitation

3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section C.1.

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

F. Miscellaneous Requirements

None

The 1

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Emissions Unit ID: **K002**

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - South Coating Area with Dry Filtration (Spray Coating of Steel Bearing Plates - Modification of PTI #03-9642 issued 10/30/96 to remove daily coating usage restriction)	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001 - K004 shall not exceed 10 tons per year for any individual HAP or 25 tons per year for all HAPs combined (See A.2.a)
	OAC rule 3745-31-05 (A)(3)	3.50 lbs of OC/hour from coating; 8.75 tons of OC /year from coating 58.33 lbs of OC/mth from cleanup; 0.35 tons of OC/year from cleanup
	OAC rule 3745-21-09 (U)(1)(c)	See A.2.b 3.5 lbs of OC/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding Title V:

Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, and K004 shall not exceed 10 tons per rolling

Emissions Unit ID: **K002**

12-month period for any individual HAP or 25 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	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	<25.00

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.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(c).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), in lbs/gal;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the number of gallons of each coating employed;

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- e. the OC emission rate for each coating © x d);
 - f. the total OC emission rate for all coatings (summation of e), in pounds or tons;
 - g. the annual year to date OC emissions from coating usage, in tons per year (summation of e for each calendar month to date from January to December).
2. The permittee shall collect and record the following each month for cleanup material usage:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed (b x c);
 - e. the total OC emissions from all cleanup materials employed (summation of d), in pounds or tons;
 - f. the annual year to date OC emissions from cleanup material usage, in tons per year (summation of e for each calendar month to date from January to December).

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

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

3. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material, 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, (b) x (c) for each individual HAP, in lbs/month;

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Emissions Unit ID: **K002**

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- e. the total emission rate for each individual HAP from all coatings and cleanup materials employed (summation of d for each individual HAP), in lbs/month;
- f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed (summation of e for all HAPs), in lbs/month;
- g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

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

- 4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 (ug/m3): 43,400

Maximum Hourly Emission Rate (lbs/hr): 2.43

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 101.80

MAGLC (ug/m3): 10,333.00

- 5. 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

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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 composition 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(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts 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 monthly record showing the use of noncomplying coatings. 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 calendar month.
- 2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the general terms and conditions of this permit.
- 3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of

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the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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E. Testing Requirements

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

- a. Emission Limitation

- a. 3.50 lbs of OC/hour (from the use of coatings)

- Applicable Compliance Method

- The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

- * The potential to emit is based on a maximum coating usage rate of 1.0 gallon per hour and a maximum OC content of 3.50 pounds per gallon.

- b. Emission Limitation

- b. 8.75 tons of OC/year (from the use of coatings)

- Applicable Compliance Method

- Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.1.

- c. Emission Limitation

- c. 58.33 lbs of OC/month (from the use of cleanup materials)

- Applicable Compliance Method

- Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

- d. Emission Limitation

- d. 0.35 tons of OC/year (from the use of cleanup materials)

- Applicable Compliance Method

- Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

- e. Emission Limitation

- e. Not to exceed 10 tons per rolling 12-month period of any individual HAP or 25 tons per rolling 12-month period of any combination of HAPs (from emissions unit K001-K004 combined)

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Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section C.3.

f.

Emission Limitation

3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section C.1.

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

F. Miscellaneous Requirements

None

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Metal Parts Coating Line with Dry Filtration (Less than 10 Gallons per Day)	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001 - K004 shall not exceed 10 tons per year for any individual HAP or 25 tons per year for all HAPs combined (See A.2.a)
	OAC rule 3745-31-05 (A)(3)	6.70 lbs of OC/hour from coating; 4.69 tons of OC /year from coating 58.33 lbs of OC/mth from cleanup; 0.35 tons of OC/year from cleanup
	OAC rule 3745-21-09 (U)(2)(e)(iii)	See A.2.b VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding Title V:

Combined annual HAP emissions resulting from the use of coatings and cleanup materials

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in emissions units K001, K002, K003, and K004 shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 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	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	<25.00

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.

2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(d).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;

- c. the volume, in gallons, of each coating employed; and
 - d. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall (in conjunction with the information required in C.1) collect and record the following information on each month for purposes of determining annual OC emissions:
 - a. the total OC emissions from each coating employed, in tons per month (C.1.b x C.1.c);
 - b. the total OC emissions from all coatings employed, in tons per month (summation of C.2.a)
 - c. the annual year to date OC emissions from coating usage, in tons per year (sum of b for each calendar month to date from January to December)
3. The permittee shall collect and record the following each month:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the total volume, in gallons, of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed, in pounds (C.3.b x C.3.c); and
 - e. the total OC emissions from all cleanup materials employed, in pounds or tons (summation of C.3.d);
 - f. the annual year to date OC emissions from cleanup material usage, in tons per year (summation of C.3.e. for each calendar month to date from January to December).

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

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

4. The permittee shall collect and record the following information for HAP emissions each month:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material, as

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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, (b) x (c) for each individual HAP, in lbs/month;
- e. the total emission rate for each individual HAP from all coatings and cleanup materials employed (summation of d for each individual HAP), in lbs/month;
- f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed (summation of e for all HAPs), in lbs/month;
- g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

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

5. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 3.07

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 128.40

MAGLC (ug/m3): 4,486.00

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 3.57

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 149.50
MAGLC (ug/m3): 10,338.00

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

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

7. 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.

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D. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the general terms and conditions of this permit.
3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. 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 specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

6.70 lbs of OC/hour (from the use of coatings)

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit is based on a maximum coating usage rate of 1.0 gallon per hour (56.5% Chemlok 252X thinned with 43.5% toluene) and a maximum OC content of 6.70 pounds per gallon.

b. Emission Limitation

4.69 tons of OC/year (from the use of coatings)

Applicable Compliance Method

Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

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- c. Emission Limitation
58.33 lbs of OC/month (from the use of cleanup materials)

Applicable Compliance Method
Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.3.
- d. Emission Limitation
0.35 tons of OC/year (from the use of cleanup materials)

Applicable Compliance Method
Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.3.
- e. Emission Limitation
Not to exceed 10 tons per rolling 12-month period of any individual HAP or 25 tons per rolling 12-month period of any combination of HAPs (from emissions unit K001-K004 combined)

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements in section C.4.
- f. Emission Limitation
Maximum daily coating usage rate not to exceed 10 gallons per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements in section C.1.

F. Miscellaneous Requirements

None

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Metal Parts Coating Line with Dry Filtration (Less than 10 Gallons per Day)	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001 - K004 shall not exceed 10 tons per year for any individual HAP or 25 tons per year for all HAPs combined (See A.2.a)
	OAC rule 3745-31-05 (A)(3)	6.70 lbs of OC/hour from coating; 2.35 tons of OC /year from coating 58.33 lbs of OC/mth from cleanup; 0.35 tons of OC/year from cleanup
	OAC rule 3745-21-09 (U)(2)(e)(iii)	See A.2.b VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding Title V:

Combined annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K003, and K004 shall not exceed 10 tons per rolling

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12-month period for any individual HAP or 25 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	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	<25.00

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.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(d).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;

- c. the volume, in gallons, of each coating employed; and
 - d. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall (in conjunction with the information required in C.1) collect and record the following information on each month for purposes of determining annual OC emissions:
 - a. the total OC emissions from each coating employed, in tons per month (C.1.b x C.1.c);
 - b. the total OC emissions from all coatings employed, in tons per month (summation of C.2.a)
 - c. the annual year to date OC emissions from coating usage, in tons per year (sum of b for each calendar month to date from January to December)
3. The permittee shall collect and record the following each month:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the total volume, in gallons, of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed, in pounds (C.3.b x C.3.c); and
 - e. the total OC emissions from all cleanup materials employed, in pounds or tons (summation of C.3.d);
 - f. the annual year to date OC emissions from cleanup material usage, in tons per year (summation of C.3.e. for each calendar month to date from January to December).

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

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

4. The permittee shall collect and record the following information for HAP emissions each month:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating and cleanup material, as applied;

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- 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, (b) x (c) for each individual HAP, in lbs/month;
- e. the total emission rate for each individual HAP from all coatings and cleanup materials employed (summation of d for each individual HAP), in lbs/month;
- f. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed (summation of e for all HAPs), in lbs/month;
- g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

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

- 5. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 3.07

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 128.40

MAGLC (ug/m3): 4,486.00

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 3.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 149.50

MAGLC (ug/m3): 10,338.00

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

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

7. 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.

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D. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the general terms and conditions of this permit.
3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. 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 specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
6.70 lbs of OC/hour (from the use of coatings)

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit is based on a maximum coating usage rate of 1.0 gallon per hour (56.5% Chemlok 252X thinned with 43.5% toluene) and a maximum OC content of 6.70 pounds per gallon.

- b. Emission Limitation
2.35 tons of OC/year (from the use of coatings)

Applicable Compliance Method

Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.2.

The D.S. Brown Company
PTI Application 02-12757
Issue

Facility ID: 0387000118

Emissions Unit ID: K004

The 1

PTI 2

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

- c. Emission Limitation
58.33 lbs of OC/month (from the use of cleanup materials)

Applicable Compliance Method
Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.3.
- d. Emission Limitation
0.35 tons of OC/year (from the use of cleanup materials)

Applicable Compliance Method
Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.3.
- e. Emission Limitation
Not to exceed 10 tons per rolling 12-month period of any individual HAP or 25 tons per rolling 12-month period of any combination of HAPs (from emissions unit K001-K004 combined)

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements in section C.4.
- f. Emission Limitation
Maximum daily coating usage rate not to exceed 10 gallons per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements in section C.1.

F. Miscellaneous Requirements

None