



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

**Application No: 03-17007
Fac ID: 0388010035**

DATE: 10/6/2005

Todco, Division of Overhead Door
Mike Traxler
P.O. Box 338 781 Route 30 West
Upper Sandusky, OH 43351

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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

Sincerely,

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

CC: USEPA

NWDO

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 03-17007

Application Number: 03-17007
Facility ID: 0388010035
Permit Fee: **To be entered upon final issuance**
Name of Facility: Todco, Division of Overhead Door
Person to Contact: Mike Traxler
Address: P.O. Box 338 781 Route 30 West
Upper Sandusky, OH 43351

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

**781 Route 30 West
Upper Sandusky, Ohio**

Description of proposed emissions unit(s):

New paint booth.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Todco, Division of Overhead Door
PTI Application: 03-17007
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0388010035

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 record keeping 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 record keeping 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,

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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.

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9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the 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>
OC	39.09
Individual 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

- 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 - Paint spray booth with drying oven and dry filtration system	OAC rule 3745-31-05(A)(3)	26.25 lbs organic compounds (OC)/hr from coating operations (See A.2.a)
		202.5 lbs OC/month and 1.22 tons OC/yr from cleanup operations
		988.5 lbs OC/month and 5.93 tons OC/month from door wipe operations
	OAC rule 3745-31-05(C)	See A.2.b
		31.94 tons of OC per rolling, 12-month period from coating operations (See A.2.c, B.2, and B.3)
	OAC rule 3745-21-07(G)(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 unit K001 and K002 combined (See A.2.d)
	OAC rule 3745-21-09(U)(1)(d)	

Todco

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OC emissions shall not exceed
8 pounds per hour and 40
pounds per day (See A.2.e)

3.5 pounds VOC per gallon of
coating, excluding water and
exempt solvents, for coatings
dried at temperatures not
exceeding 200 degrees
Fahrenheit (See A.2.f)

2. Additional Terms and Conditions

- 2.a** This emissions unit is subject to 26.25 lbs OC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section A.2.e.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.c** The emissions of OC from emissions unit K002 shall not exceed 31.94 tons per year based on a rolling, 12- month summation of the monthly emissions. The federally enforceable OC limitation is based on coating content and usage restrictions (See B.2 and B.3). Federally enforceable OC limitations are being established for the purpose of avoiding Title V applicability. For purposes of federal enforceability a restriction on OC emissions effectively limits VOC emissions.
- 2.d** HAP emissions from emissions unit K001 and K002 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based on a rolling, 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

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 for K001 and K002 combined:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)

Emissions Unit ID: K002

	<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.

- 2.e** This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- 2.f** This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.

B. Operational Restrictions

1. The use of photochemically reactive materials for cleanup operations and door wipe operations in this emissions unit is prohibited. Photochemically reactive material is defined in OAC rule 3745-21-01.
2. The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.
3. The maximum annual coating usage rate for this emissions unit shall not exceed 18,250 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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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	1550
1-2	3100
1-3	4650
1-4	6200
1-5	7750
1-6	9300
1-7	10,850
1-8	12,400
1-9	13,950
1-10	15,500
1-11	17,050
1-12	18,250

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.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01.
2. On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:
 - a. The company name and identification for each coating employed on a non-metal

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- substrate;
- b. The number of gallons of each coating applied on a non-metal substrate;
 - c. The organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
 - d. The total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day (C.2.b x C.2.c);
 - e. The total number of hours the emissions unit was involved in the operation of coating of non-metal substrates;
 - f. The average hourly organic compound emission rate involving the operation of coating non-metal substrates (C.2.d/C.2.e.), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01.]

3. The permittee shall collect and record the following information when any coating is applied to a metal substrate:
 - a. The company name and identification for each coating employed on a metal substrate;
 - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.
4. In conjunction with the coating information required above, the permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
 - 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 number of gallons of each coating employed;

Emissions Unit ID: **K002**

- d. The total number of gallons of all coatings employed (summation of C.4.c);
 - e. For the first 12 months of operation, the cumulative monthly coating usage rate from all coatings, in gallons per month; and
 - f. After the first 12 months of operation, the annual coating usage rate, based upon a rolling 12-month summation of monthly coating usage rates.
 - g. The OC emission rate for each coating (C.4.b x C.4.c);
 - h. The total OC emission rate for all coatings (summation of C.4.g), in pounds or tons;
 - i. For the first 12 months of operation, the cumulative monthly OC emission rate from all coatings, in tons per month; and
 - j. After the first 12 months of operation, the annual OC emissions, based upon a rolling 12-month summation of monthly emissions.
- 5.** The permittee shall collect and record the following each month for cleanup operations:
- a. The name and identification of each cleanup material employed;
 - b. Documentation as to whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
 - c. The OC content of each cleanup material employed, in pounds per gallon;
 - d. The number of gallons of each cleanup material employed;
 - e. The OC emissions from each cleanup material employed (C.5.c x C.5.d);
 - f. The total OC emissions from all cleanup materials employed (summation of C.5.e), in pounds or tons;
 - g. The annual year to date OC emissions from cleanup operations, in tons per year (summation of C.5.f 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:

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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.

6. The permittee shall collect and record the following each month for door wipe operations:
 - a. The name and identification of each door wipe material employed;
 - b. Documentation as to whether or not each door wipe material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
 - c. The OC content of each door wipe material employed, in pounds per gallon;
 - d. The number of gallons of each door wipe material employed;
 - e. The OC emissions from each door wipe material employed (C.6.c x C.6.d);
 - f. The total OC emissions from all door wipe materials employed (summation of C.6.e), in pounds or tons;
 - g. The annual year to date OC emissions from door wipe operations, in tons per year (summation of C.6.f for each calendar month to date from January to December).

7. The permittee shall collect and record the following HAP information each month for emission unit K001 and K002 combined:
 - a. The company identification of each coating, cleanup material, and door wipe material employed;
 - b. The amount of each individual HAP in each coating, cleanup material, and door wipe material in lbs/gallon, as applied;
 - c. The number of gallons of each coating, cleanup material, and door wipe material employed;
 - d. The emission rate for each individual HAP from each coating, cleanup material, and door wipe material employed (C.7.b x C.7.c) for each individual HAP, in

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lbs/month;

- e. The total emission rate for each individual HAP from all coatings, cleanup materials, door wipe materials employed (summation of C.7.d for each individual HAP), in lbs/month;
- f. The total HAP emission rate for all HAPs combined from all coatings, cleanup materials, and door wipe materials employed (summation of C.7.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 monthly emissions.

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

- 8. 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 Screen3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Screen3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: 2-butoxyethyl acetate

TLV (mg/m³): 131,040

Maximum Hourly Emission Rate (lbs/hr): 26.25

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 1330

MAGLC (mg/m³): 3120

Pollutant: MEK

TLV (mg/m³): 589,800

Maximum Hourly Emission Rate (lbs/hr):

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

MAGLC (mg/m³): 14,043

Pollutant: Acetone

TLV (mg/m³): 28,262

Maximum Hourly Emission Rate (lbs/hr): 132.85

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 6679

MAGLC (mg/m³): 28,262

9. 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 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.

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10. 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

D. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.50 lbs of VOC/gallon excluding water and exempt solvents when coating a metal substrate) 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 calendar month.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
 - a. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition C.2.f exceeded 8 pounds per hour;
 - b. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition C.2.d exceeded 40 pounds per day;
 - c. Any exceedances of the 31.94 tons OC per rolling 12-month period as specified in section A.2.c;
 - d. Any exceedances of the maximum annual coating usage rate not to exceed 18,500 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates as specified in B.3;

Emissions Unit ID: **K002**

- e. For the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative coating usage levels specified in B.3.
- f. Any exceedances of the OC content of any coating employed not to exceed 3.50 lbs per gallon, as applied.
- g. Any exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.d;
- h. 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.d;
- i. Any exceedances of the 202.5 lbs OC/month from cleanup operations; and
- j. Any exceedances of the 988.5 lbs OC/month from door wipe operations.

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 1.22 tons OC/yr from cleanup operations. 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.
- 4. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the 5.93 tons OC/yr from door wipe operations. 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.
- 5. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of photochemically reactive material for cleanup operations and door wipe operations 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 calendar month.

E. Testing Requirements

- 1. Compliance with the emission limitations specified in section A.1 of these terms and

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conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 26.25 lbs OC/hr from coating operations

Applicable Compliance Method: The hourly emission limitation is based on a maximum coating usage rate of 7.5 gallons per hour and a OC content restriction of 3.50 pounds per gallon. Therefore provided compliance is shown with OC content restriction, compliance with the hourly emission limitation will be assumed.

- b. Emission Limitation: 202.5 lbs OC/month from cleanup operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.5.

- c. Emission Limitation: 1.22 tons OC from cleanup operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation: 988.5 lbs OC/month from door wipe operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.6.

- e. Emission Limitation: 5.93 tons OC from door wipe operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.6.

- f. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- g. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3. Formulation data or U.S. EPA Method 24 shall be used to

determine the VOC content of the coatings.

- h. Emission Limitation: 31.94 tons of OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- i. Emission Limitation: 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 unit K001 and K002 combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.7.

- j. Emission Limitation: The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.b.

- k. Emission Limitation: The maximum annual coating usage rate for this emissions unit shall not exceed 18,250 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.e.

F. Miscellaneous Requirements

None

Todco, Division of Overhead Door
PTI Application: 03-17007
Issued: To be entered upon final issuance

Facility ID: 0388010035

Emissions Unit ID: **K002**

SIC CODE 2431 SCC CODE 9-99-999-99 EMISSIONS UNIT ID K002
 EMISSIONS UNIT DESCRIPTION Paint spray booth with dry filtration system
 DATE INSTALLED Upon issuance of PTI

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	26.26 lbs/hr from coatings; 202.5 lbs/month from cleanup; 988.5 lbs/month from door wipe operations	31.94 from coatings; 1.22 from cleanup; 5.93 from door wipe operations	26.26 lbs/hr from coatings; 202.5 lbs/month from cleanup; 988.5 lbs/month from door wipe operations	31.94 from coatings; 1.22 from cleanup; 5.93 from door wipe operations
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Use of a dry filtration system and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: 2-butoxyethyl acetate, MEK and acetone