



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
LUCAS COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01210

DATE: 3/22/00

AGA Gas Inc
John Swanson
6421 Monclova Rd
Maumee, OH 43537

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

TDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 3/22/00

FINAL PERMIT TO INSTALL 04-01210

Application Number: 04-01210
APS Premise Number: 0448002058
Permit Fee: **\$600**
Name of Facility: AGA Gas Inc
Person to Contact: John Swanson
Address: 6421 Monclova Rd
Maumee, OH 43537

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

**6421 Monclova
Maumee, Ohio**

Description of proposed emissions unit(s):

Three paint spray booths for miscellaneous metal parts.

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 and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

AGA Gas Inc
 PTI Application: 04-01210
 Issued: 3/22/00

Facility ID: 0448002058

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>
particulates	2.1
VOC	33.6

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.

Table with 3 columns: Operations, Property, and/or Equipment; Applicable Rules/Requirements; Applicable Emissions Limitations/Control Measures. Rows include details for K002 - Paint spray booth for miscellaneous metal parts, listing various OAC rules and their corresponding emission limits.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
2.b The requirements of this rule also include compliance with the requirements of OAC rule

3745-17-07(A)(1), OAC rule 3745-17-11(B)(1) and OAC rule 3745-21-09(U)(1)(d).

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
 - c. The number of gallons of each coating employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services 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 Toledo Division of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of more than 400 gallons of coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

E. Testing Requirements

Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:

visible particulate emissions shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be based upon visible emission readings performed in compliance with the methods and procedures of OAC rule 3745-17-03(B)(1).

2. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

3. Emission Limitation:

6.1 pounds VOC per hour and 8.4 tons VOC per year,

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment (1.75 gallons per hour and 400 gallons per month of coating). Any physical changes to or changes in the method of operation of the emissions unit which would allow the emission unit to exceed these emissions limitations would constitute a "modification" by the definition of OAC rule 3745-31-01(VV) and require the permittee to apply for and obtain a new permit to install.

4. Emission Limitation:

0.5 pound particulate (PM) per hour and 0.07 ton PM per year.

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment (1.75 gallons per hour and 400 gallons per month of coating). Any physical changes to or changes in the method of operation of the emissions unit which would allow the emission unit to exceed these emissions limitations would constitute a "modification" by the definition of OAC rule 3745-31-01(VV) and require the permittee to apply for and obtain a new permit to install.

F. Miscellaneous Requirements

- The permit to install for emissions units K002, K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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 the combined emissions of each pollutant emitted by these emissions units 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) for the combined emissions of K002, K003 and K004:

Pollutant:	2-butanol	
TLV (mg/m3):	308	
Maximum Hourly Emission Rate (lbs/hr):	0.70	
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):		165
MAGLC (ug/m3):	7,300	
Pollutant:	2-butoxyethanol	
TLV (mg/m3):	123	
Maximum Hourly Emission Rate (lbs/hr):	0.99	
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):		280
MAGLC (ug/m3):	2,900	

Physical changes to or changes in the method of operation of the emissions unit(s) 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.

2. 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(s) still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that

12

AGA Gas Inc

PTI Application: 04 01210

Issued

Facility ID: 0448002058

Emissions Unit ID: **K002**

show the results of the application of the "Air Toxic Policy" for the change.

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 - Paint spray booth for miscellaneous metal parts.	OAC rule 3745-17-07(A)(1)	visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-17-11(B)(1)	see section 2.a.
	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
	OAC rule 3745-31-05(A)(3)	0.5 pound particulate (PM) per hour, 0.7 ton PM per year, 6.1 pounds VOC per hour, 8.4 tons VOC per year, and see section 2.b.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The requirements of this rule also include compliance with the requirements of OAC rule

14

AGA C

PTI A

Issued: 3/22/00

Emissions Unit ID: **K003**

3745-17-07(A)(1), OAC rule 3745-17-11(B)(1) and OAC rule 3745-21-09(U)(1)(d).

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
 - c. The number of gallons of each coating employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services 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 Toledo Division of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of more than 400 gallons of coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

E. Testing Requirements

Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:

AGA Gas Inc
PTI Application: 04-01210
Issued

Facility ID: 0448002058

Emissions Unit ID: K003

visible particulate emissions shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be based upon visible emission readings performed in compliance with the methods and procedures of OAC rule 3745-17-03(B)(1).

2. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

3. Emission Limitation:

6.1 pounds VOC per hour and 8.4 tons VOC per year,

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment (1.75 gallons per hour and 400 gallons per month of coating). Any physical changes to or changes in the method of operation of the emissions unit which would allow the emission unit to exceed these emissions limitations would constitute a "modification" by the definition of OAC rule 3745-31-01(VV) and require the permittee to apply for and obtain a new permit to install.

4. Emission Limitation:

0.5 pound particulate (PM) per hour and 0.07 ton PM per year.

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment (1.75 gallons per hour and 400 gallons per month of coating). Any physical changes to or changes in the method of operation of the emissions unit which would allow the emission unit to

18

AGA C

PTI A

Issued: 3/22/00

Emissions Unit ID: **K003**

exceed these emissions limitations would constitute a "modification" by the definition of OAC rule 3745-31-01(VV) and require the permittee to apply for and obtain a new permit to install.

F. Miscellaneous Requirements

1. The permit to install for emissions units K002, K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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 the combined emissions of each pollutant emitted by these emissions units 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) for the combined emissions of K002, K003 and K004:

Pollutant:	2-butanol	
TLV (mg/m3):	308	
Maximum Hourly Emission Rate (lbs/hr):	0.70	
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):		165
MAGLC (ug/m3):	7,300	
Pollutant:	2-butoxyethanol	
TLV (mg/m3):	123	
Maximum Hourly Emission Rate (lbs/hr):	0.99	
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):		280
MAGLC (ug/m3):	2,900	

Physical changes to or changes in the method of operation of the emissions unit(s) 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 still 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.

2. 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(s) 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.

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 - Paint spray booth for miscellaneous metal parts.	OAC rule 3745-17-07(A)(1)	visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-17-11(B)(1)	see section 2.a.
	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
	OAC rule 3745-31-05(A)(3)	0.5 pound particulate (PM) per hour, 0.7 ton PM per year, 6.1 pounds VOC per hour, 8.4 tons VOC per year, and see section 2.b.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1) and OAC rule 3745-21-09(U)(1)(d).

22

AGA C

PTI A

Issued: 3/22/00

Emissions Unit ID: **K004**

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
 - c. The number of gallons of each coating employed.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services 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 Toledo Division of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of more than 400 gallons of coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

E. Testing Requirements

Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:

visible particulate emissions shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be based upon visible emission readings performed in compliance with the methods and procedures of OAC rule 3745-17-03(B)(1).

2. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

3. Emission Limitation:

6.1 pounds VOC per hour and 8.4 tons VOC per year,

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment (1.75 gallons per hour and 400 gallons per month of coating). Any physical changes to or changes in the method of operation of the emissions unit which would allow the emission unit to exceed these emissions limitations would constitute a "modification" by the definition of OAC rule 3745-31-01(VV) and require the permittee to apply for and obtain a new permit to install.

4. Emission Limitation:

0.5 pound particulate (PM) per hour and 0.07 ton PM per year.

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment (1.75 gallons per hour and 400 gallons per month of coating). Any physical changes to or changes in the method of operation of the emissions unit which would allow the emission unit to exceed these emissions limitations would constitute a "modification" by the definition of OAC rule 3745-31-01(VV) and require the permittee to apply for and obtain a new permit to install.

F. Miscellaneous Requirements

- The permit to install for emissions units K002, K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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 the combined emissions of each pollutant emitted by these emissions units 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) for the combined emissions of K002, K003 and K004:

Pollutant:	2-butanol	
TLV (mg/m ³):	308	
Maximum Hourly Emission Rate (lbs/hr):	0.70	
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m ³):		165
MAGLC (ug/m ³):	7,300	
Pollutant:	2-butoxyethanol	
TLV (mg/m ³):	123	
Maximum Hourly Emission Rate (lbs/hr):	0.99	
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m ³):		280
MAGLC (ug/m ³):	2,900	

Physical changes to or changes in the method of operation of the emissions unit(s) 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

Emissions Unit ID: **K004**

still be still 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.

2. 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(s) 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.

NEW SOURCE REVIEW FORM B

PTI Number: 04-01210 Facility ID: 0448002058

FACILITY NAME AGA Gas Inc

FACILITY DESCRIPTION Three paint spray booths for miscellaneous metal parts. CITY/TWP Maumee

SIC CODE 2813 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION paint spray booth for miscellaneous metal parts

DATE INSTALLED 3/15/00

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	attainment	0.3	0.5	0.5	0.7
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.2	3.9	6.1	8.4
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?

particulate filtration and compliance coatings with a ton/year limitation based on throughput

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-butoxyethanol and 2-butanol

NEW SOURCE REVIEW FORM B

PTI Number: 04-01210

Facility ID: 0448002058

FACILITY NAME AGA Gas Inc

FACILITY DESCRIPTION Three paint spray booths for miscellaneous CITY/TWP Maumee

Emissions Unit ID: **K004**

SIC CODE 2813

SCC CODE 4-02-025-01

EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION paint spray booth for miscellaneous metal parts

DATE INSTALLED 3/15/00

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	attainment	0.3	0.5	0.5	0.7
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.2	3.9	6.1	8.4
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?

particulate filtration and compliance coatings with a ton/year limitation based on throughput

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-butoxyethanol and 2-butanol

30 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **K004**

FACILITY DESCRIPTION Three paint spray booths for miscellaneous metal parts. CITY/TWP Maumee

SIC CODE 2813 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION paint spray booth for miscellaneous metal parts

DATE INSTALLED 3/15/00

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	attainment	0.3	0.5	0.5	0.7
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.2	3.9	6.1	8.4
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?

particulate filtration and compliance coatings with a ton/year limitation based on throughput

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-butoxyethanol and 2-butanol

3 NEW SOURCE REVIEW FORM B

PTI Number: 04-01210

Facility ID: 0448002058

FACILITY NAME AGA Gas Inc

FACILITY DESCRIPTION Three paint spray booths for miscellaneous CITY/TWP Maumee

Emissions Unit ID: **K004**

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

AGA Gas, Inc., 0448002058 04-01210

Description

This permit to install is for three new spray painting operations, coating gas cylinders. AGA proposes to install pre-fabricated spray booths equipped with particulate filters and will utilize compliance coatings. Infra-red lighting will be used to cure the paint at a maximum 140°F.

Applicable regulations

- OAC rule 3745-17-07(A)(1) - 20% opacity as a 6-minute average
- OAC rule 3745-17-11(B)(1) - 0.551 pound of particulate per hour
- OAC rule 3745-21-09(U)(1)(d) - 3.5 lbs VOC/gallon
- OAC rule 3745-31-05(A)(3) - best available control

BAT determination

A particulate filtration unit will be required for particulate control. Compliance coatings (<3.5 lbs/gal) will be considered BAT for VOC. AGA will be using air-assisted airless spray guns. Some touch up painting may be performed by brush. AGA will be utilizing a low VOC coating and was advised that the air assisted airless guns would be able to apply a thinner coating, thus lower emissions. To meet the tpy restrictions AGA has requested a 400 gallon/mo/booth restriction.

Potential to emit

AGA identifies a maximum monthly application rate of 400 gallons per booth. At 3.5 pounds VOC per gallon, this equates to a PTE of 8.4 tons per year per booth. Maximum hourly emissions are estimated at 1.75 pounds per gallon for 6.1 lb/hr. Particulate is estimated based on a transfer efficiency of 45% (AP-42 Table 4.2.2.11-1 dated 1/95), a solids content of 5 pounds per gallon, and a 90% effective control by enclosure and subsequent air filtration as $400(.55)(5)(.1) \div 2000 = 0.7$ tpy. Hourly emissions are estimated as $1.75(.55)(5)(.1) = 0.5$ lb/hr.

Facility-wide new emissions would be 33.6 tons VOC and 2.1 tons per year particulate.

Permit allowable

FACILITY DESCRIPTION

Three paint spray booths for miscellaneous metal parts.

CITY/TWP

Maumee

Allowables will be set at PTE levels = 6.1 lb VOC/hr, 8.4 tons per year, 0.5 lbs PM/hr and 0.7 tons per year.

Actuals

Actuals will be estimated at 3640 gallons per year per booth and 1 gallon per hour at 2.15 lb VOC/gallon for 2.2 lb/hr and 3.9 tons per year VOC, 0.3 lbs PM/hr and 0.5 tons per year per booth.

Other applicable rules:

Air toxics is applicable. At 33.6 tons per year and 18.3 pounds per hour VOC, AGA identifies three air toxics:

weight %	CAS	Stpy	TLV(mg/m3)	lb/hrg/s	TLV/42MAGLC
2-butoxyethano	15.4111-76-21.81230.990.1502,900280				
2-butano	13.878-92-021.33080.700.0887,300165				
aliphatic hydrocarbon	0.18052-41-30.3----				

Fees: 3 minimum process weight = \$3 x 200 = \$600.

03/01/00

16:07:36

*** SCREEN3 MODEL RUN ***

*** VERSION DATED 96043 ***

AGA

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	1.00000
STACK HEIGHT (M)	=	7.3200
STK INSIDE DIAM (M)	=	.6100
STK EXIT VELOCITY (M/S)	=	5.6521
STK GAS EXIT TEMP (K)	=	293.0000
AMBIENT AIR TEMP (K)	=	293.0000
RECEPTOR HEIGHT (M)	=	.0000
URBAN/RURAL OPTION	=	URBAN
BUILDING HEIGHT (M)	=	5.8000
MIN HORIZ BLDG DIM (M)	=	18.0000
MAX HORIZ BLDG DIM (M)	=	100.0000

NEW SOURCE REVIEW FORM B

PTI Number: 04-01210

Facility ID: 0448002058

FACILITY NAME AGA Gas Inc

FACILITY DESCRIPTION Three paint spray booths for miscellaneous CITY/TWP Maumee

Emissions Unit ID: **K004**

**THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.**

**STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 3500.0000 (ACFM)**

BUOY. FLUX = .000 M4/S**3; MOM. FLUX = 2.972 M**4/S**2.**

***** FULL METEOROLOGY *****

***** SCREEN AUTOMATED DISTANCES *****

***** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES *****

DIST (M)	CONC (UG/M**3)	U10M STAB (M/S)	USTK (M/S)	MIX HT (M)	PLUME Y (M)	SIGMA Z (M)	SIGMA DWASH
1.	.0000	0	.0	.0	.0	.00	.00 NA
100.	1009.	6	2.0	2.0	10000.0	8.66	10.79 7.46 SS
200.	642.4	6	1.0	1.0	10000.0	14.19	21.17 14.03 SS
300.	397.4	6	1.0	1.0	10000.0	14.19	31.18 19.93 SS
400.	263.1	6	1.0	1.0	10000.0	14.19	40.85 25.30 SS

**MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
25. 1872. 1 1.0 1.0 320.0 9.71 8.28 6.32 SS**

**DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB**

***** REGULATORY (Default) ***
PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)**

34 NEW SC

PTI Num

FACILITY

FACILITY DESCRIPTION

Three paint spray booths for miscellaneous metal parts.

Emissions Unit ID: **K004**

CITY/TWP Maumee

*** CAVITY CALCULATION - 1 *** *** CAVITY CALCULATION - 2 ***

CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 5.96	CAVITY HT (M) = 5.80
CAVITY LENGTH (M) = 32.95	CAVITY LENGTH (M) = 17.74
ALONGWIND DIM (M) = 18.00	ALONGWIND DIM (M) = 100.00

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

END OF CAVITY CALCULATIONS

***** SUMMARY OF SCREEN MODEL RESULTS *****

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
-----	-----	-----	-----
SIMPLE TERRAIN	1872.	25.	0.

**** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS ****

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

35 NEW SC

PTI Num

FACILITY

Emissions Unit ID: **K004** _____

FACILITY DESCRIPTION Three paint spray booths for miscellaneous
metal parts.

CITY/TWP Maumee

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
particulates	2.1
VOC	33.6