



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: 04-01208

DATE: 2/16/00

Thermogas Co
Denny Rittichier
8348 Providence-Neapolis Swanton Rd
Neapolis, OH 43547

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

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STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 2/16/00

FINAL PERMIT TO INSTALL 04-01208

Application Number: 04-01208
APS Premise Number: 0448002083
Permit Fee: **\$200**
Name of Facility: Thermogas Co
Person to Contact: Denny Rittichier
Address: 8348 Providence-Neapolis Swanton Rd
Neapolis, OH 43547

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

**348 Providence-Neapolis Swanton Rd
Neapolis, Ohio**

Description of proposed emissions unit(s):

Propane tank paint spray booth.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



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

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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>
PM	0.70
VOC	13.44

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>
Propane Tank Reconditioning/Painting Center	OAC rule 3745-31-05(A)(3)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit
		13.44 tons VOC per rolling 12-month period
		0.551 pound per hour particulate emissions
		0.70 ton particulate emissions per rolling 12-month period
		visible particulate emissions shall not exceed twenty per cent opacity, as a six-minute average
	OAC rule 3745-21-09(U)(1)(d)	See 2.a.
	OAC rule 3745-17-11(B)(1)	See 2.a.
OAC 3745-17-07(A)(1)	See 2.a.	

2. Additional Terms and Conditions

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PTI A

Issued: 2/16/00

Emissions Unit ID: **K001**

- 2.a** The limitation established under the authority of OAC rule 3745-31-05(A)(3) is as stringent or more stringent than this OAC rule.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 7,000 gallons of coating materials and 365 gallons of cleanup materials, based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable (gallons) Cumulative Coating Usage</u>	<u>Maximum Allowable (gallons) Cumulative Cleanup Usage</u>
1	1,000	50
1-2	2,000	100
1-3	3,000	150
1-4	4,000	200
1-5	5,000	250
1-6	6,000	300
1-7	7,000	350
1-8	7,000	365
1-9	7,000	365
1-10	7,000	365
1-11	7,000	365
1-12	7,000	365

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 coating usage and cleanup figures.

2. 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:

- 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 coating usage and cleanup material used for each month.

- d. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating and cleanup usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

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 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 Toledo Division of Environmental Services within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating cleanup usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

E. Testing Requirements

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

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:

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Compliance shall be based upon the record keeping requirements specified in Section C. 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.

2. Emission Limitation:

13.44 tons VOC per rolling 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by recordkeeping and reporting requirements of section C of this permit.

3. Emission Limitation:

0.70 ton particulate emissions per rolling 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring, recordkeeping and reporting requirements of this permit.

4. Emission Limitation:

0.551 pound particulate emissions per hour

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring, recordkeeping and reporting requirements of this permit.

5. Emission Limitation:

visible particulate emissions shall not exceed twenty per cent opacity, as a six-minute average

Applicable Compliance Method:

USEPA Method 9

F. Miscellaneous Requirements

This permit allows the use of the coatings and cleanup materials specified by the permittee in the PTI 04-1208 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were)

established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl ethyl ketone

TLV (ug/m3): 200,000

Maximum Hourly Emission Rate (lbs/hr):2.38

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 141

MAGLC (ug/m3): 14,042

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
- c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in

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Issued

Facility ID: 0448002083

Emissions Unit ID: **K001**

the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

Thern**PTI A****Issued: 2/16/00**Emissions Unit ID: **K001****PROCESS DESCRIPTION**

This PTI is for the installation of a Reconditioning/Painting Center (K001) for propane tanks. The tanks are abrasive blasted in a blast cabinet that is equipped with an integral dust collector. The dust collector is vented inside the building. The reconditioned (stripped) tanks are then spray painted using two airless spray guns. One gun is used for primer application and another for topcoat application. Mineral spirits are used for cleanup operations.

APPLICABLE REGULATIONS**OAC 3745-15** General Provisions

OAC 3745-31-01 (N) "**Best available technology**" means any combination of work practices, raw material specifications, throughput limitations, source design characteristics, an evaluation of the annualized cost per ton of air pollutant removed, and air pollution control devices that have been previously demonstrated to the director of environmental protection to operate satisfactorily in this state or other states with similar air quality on substantially similar air pollution sources.

OAC 3745-31-01(EEE) "**Potential to emit**" means the maximum capacity of an emissions unit or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the emissions unit or stationary source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable or legally and practicably enforceable by the state. Secondary emissions do not count in determining the potential to emit of a stationary source.

OAC 3745-31-05(A) The director shall issue a permit to install or plan approval, on the basis of the information appearing in the application, or information gathered by or furnished to the Ohio environmental protection agency, or both, if he determines that the installation or modification and operation of the air contaminant source, solid waste disposal facility, infectious waste treatment facility, water pollution source, disposal system, land application of sludge, or public water system will:

(3) Employ the best available technology, except when the only requirement to obtain a permit to install is due to a modification as described in paragraph (VV)(1)(b) of rule 3745-31-01 and paragraph (A)(2) of rule 3745-31-02 of the Administrative Code.

OAC 3745-21-09 (U) Surface coating of miscellaneous metal parts and products.(1) Except where exempted under paragraph (U)(2) of this rule, or otherwise provided in paragraph (B)(6) of this rule, no owner or operator of a miscellaneous metal part or product coating line may cause, allow or permit the discharge into the ambient air of any volatile organic compounds from such coating line after the date specified in paragraph (C)(28) of rule 3745-21-04 of the Administrative Code in excess of the following: (d) 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, or, if a control system is employed, 6.7 pounds of VOC per gallon of solids for any coating that is dried at temperatures not exceeding two hundred degrees Fahrenheit

OAC 3745-17-11 (B) Emission limitations: (1) Except as specified in paragraphs (B)(4) to (B)(6) of this rule, any owner or operator of a source of particulate emissions which is located within the following counties shall operate said source so that the particulate emissions do not exceed the allowable emission rate specified by "curve P-1" of ["Figure II"](#) or by ["Table I"](#), whichever is applicable under paragraph (A)(2) of this rule: Adams, Allen, Ashtabula, Athens, Belmont, Brown, Butler, Clark, Clermont, Clinton, Columbiana, Coshocton, Cuyahoga, Darke, Defiance, Delaware, Fairfield, Franklin, Gallia, Geauga, Greene, Hamilton, Henry, Jackson, Jefferson, Lake, Lawrence, Licking, Lorain, Lucas, Madison, Mahoning, Medina, Meigs, Miami, Monroe, Montgomery, Morgan, Muskingum, Noble, Perry, Pickaway, Portage, Preble, Richland, Ross, Sandusky, Scioto, Seneca, Shelby, Stark, Summit, Trumbull, Union, Warren, Washington, Wyandot and Wood.

OAC 3745-17-01(B)(11) "Particulate emissions" means particulate matter measurable by the applicable test methods in "Appendix A" of 40 CFR, Part 60 "Standards of Performance for New Stationary Sources," as such appendix existed on July 1, 1996.

OAC 3745-17-07 (A) Visible particulate emission limitations for stack emissions: (1) General limitations:

(a) Except as otherwise specified in paragraphs (A)(1)(b), (A)(2) and (A)(3) of this rule, visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.

(b) Except as otherwise specified in paragraphs (A)(2) and (A)(3) of this rule, visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Ohio [Air Toxics](#) Policy

Modeling was done and passed for any all toxics above 1 ton per year.

Methyl ethyl ketone - max tpy 1.29 - MAGLC 14,042 micrograms per meter cubed, modeled impact 141 micrograms per meter cubed

BEST AVAILABLE TECHNOLOGY (BAT) DETERMINATION:

PM Dry filtered paint booth enclosure. Use of airless or equivalent high transfer efficient coating system.
0.551 pounds particulate emissions per hour.

VOC Rolling 12-month limitation of 7,000 gallons of compliant coating materials and primers and 365 gallons per rolling 12-month period of clean up material.

CALCULATIONS SUMMARY:

Maximum Allowable VOC emissions: assume all VOC in paint is emitted into air.

(3,500 gallons primer + 3,500 gallons Top Coat) * 3.5 lbs VOC /GAL = 12.25 tons VOC per per rolling 12-month period

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365 gallons mineral spirits * 6.5 lbs VOC/GAL = 1.19 tons VOC per rolling 12-month period
Total VOC allowable per rolling 12-month period = 13.44 tons

Per OEPA memo from Mike Hopkins 9-9-96 Allowable PM

Maximum PM10 Allowable: assume 40% worse case Transfer Efficiency and filter Control Efficiency is 98%
(3500 GAL Topcoat + 3500 GAL Primer) * 8.34 solids per GAL = 29.19 tons per rolling 12-month period of PM

29.19 tons PM uncontrolled * (1-0.4) * (1-.98) = 0.70 ton PM per rolling 12-month period

From ["Table I"](#) 0.551 pounds particulate emissions per hour allowable. This source, as a practical matter, is too small to test and the PM emissions per hour shall be considered in compliance by use of the dry filter according to manufactures' instructions.

MODELING SUMMARY(SCREEN3):

see air toxics

Based on past modeling experiences from this field office of similar sources, modeling for particulate emissions passes