



State of Ohio Environmental Protection Agency

Mailing Address:  
Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
LUCAS COUNTY**

**CERTIFIED MAIL**

**Application No: 04-01062**

**Fac ID: 0448011516**

**DATE: 3/22/2007**

Horwitz and Pintis Company  
Steve Horwitz  
P. O. Box 60257  
Rossford, OH 43460

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 0 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, Permit Issuance and Data Management Section at (614) 644-3631.

Sincerely,

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

CC: USEPA TDES TOLEDO METRO AREA COUN OF GOVTS IN MI

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 04-01062**

Application Number: 04-01062  
Facility ID: 0448011516  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Horwitz and Pintis Company  
Person to Contact: Steve Horwitz  
Address: P. O. Box 60257  
Rossford, OH 43460

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

**1604 Tracy Street  
Toledo, Ohio**

Description of proposed emissions unit(s):

**Administrative Modification to include emissions from usage of cleanup materials in the permit allowable emissions rate.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

**Horwitz and Pintis Company**

**Facility ID: 0448011516**

**PTI Application: 04-01062**

**Issued: To be entered upon final issuance**

**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**

The permittee shall submit required reports in the following manner:

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

**3. Records Retention Requirements**

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

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

**Horwitz and Pintis Company**

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

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

#### **12. Best Available Technology**

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

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

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**Facility ID: 0448011516**

**PTI Application: 04-01062**

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This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

#### **14. Construction Compliance Certification**

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

#### **15. Fees**

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

### **B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	22.3 (1.3 increase)

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

**Operations, Property, and/or Equipment - (K001) - Paint spray booth**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)	<p>Volatile organic compound emissions (VOC) shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.</p> <p>Particulate emissions (PE) shall not exceed 1.58 tons per year.</p> <p>see Section A.2.a</p>
OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 22.3 tons per year as a rolling, 12-month summation of the monthly emissions.</p> <p>Emissions of any individual hazardous air pollutant (HAP) shall not exceed 1.6 pounds per gallon of coating and 10 tons per year as a rolling, 12-month summation of the monthly emissions.</p> <p>Emissions of any combination of HAP shall not exceed 21.0 tons per year as a rolling, 12-month summation of the monthly emissions.</p> <p>see Section 2.c</p>
OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.551 pound per hour.
OAC rule 3745-21-09(U)(1)	see Section A.2.d

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).

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- 2.b** The permittee shall not use cleanup materials containing HAP.
- 2.c** The potential emissions [as defined by OAC 3745-77-01(BB)] of hazardous air pollutants (HAPs) from all emission units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 TPY for any single HAP and 25 TPY for any combination of HAPs.
- 2.d** The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 12,000 gallons per year, based upon a rolling, 12-month summation of the monthly 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:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	1,000
1-2	2,000
1-3	3,000
1-4	4,000
1-5	5,000
1-6	6,000
1-7	7,000
1-8	8,000
1-9	9,000
1-10	10,000
1-11	11,000
1-12	12,000

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 figures.

Emissions Unit ID: **K001**

2. The maximum annual usage of photochemically reactive cleanup materials shall not exceed 2,600 pounds per year, based upon a rolling, 12-month summation of the monthly cleanup materials usage figures.

**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) in pounds per gallon of coating, as applied;
  - c. the individual HAP content of each coating in pounds per gallon of coating, as applied;
  - d. the total combined HAP content of each coating in pounds per gallon of coating, as applied;
  - e. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - f. the name and identification number of each cleanup material employed;
  - g. the VOC content of each cleanup material, in pounds per gallon;
  - h. the OC content of each cleanup material, in pounds per gallon;
  - i. the number of gallons of each cleanup material employed;
  - j. the weight of each cleanup material employed, in pounds;
  - k. the individual HAP content of each cleanup material in pounds per gallon;
  - l. the total combined HAP content of each cleanup material in pounds per gallon of cleanup material (the sum of the individual HAP contents from (k));
  - m. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the summation of (b x e) + (g x i) for all coatings and cleanup materials employed];

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- n. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons [the summation of (b x e) + (h x i) for all coatings and cleanup materials employed];
- o. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of (c) times (e) for each coating plus the sum of (k) times (i) for each cleanup material).
- p. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of (d) times (e) for each coating plus the sum of (l) times (i) for each cleanup material).
- q. the rolling, 12-month summation of the coating usage, in gallons; and
- r. the rolling, 12-month summation of the usage of cleanup materials containing VOC, in pounds.

(The above-mentioned information must be maintained separately for the line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

**D. Reporting Requirements**

- 1. The permittee shall notify the Toledo Division of Environmental Services (TES) 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 TES within 30 days following the end of the calendar month.
- 2. The permittee shall notify the TES of any monthly record showing any deviation from the following:
  - a. An identification of all months during which the Hazardous Air Pollutant (HAP) content limitation(s) were exceeded (pound of individual HAP per gallon of coating or pound of VOC per gallon of coating limitations);
  - b. The total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in tons per year per rolling 12 month period;

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- c. The total combined HAP emissions limitation from all coatings and cleanup materials employed, in tons per year per rolling 12 month period;
- d. Exceedances of the 12,000 gallons of coating per rolling, 12-month period limitation and, for the first 12 calendar months of operation, exceedances of the maximum allowable cumulative coating usage levels;
- e. Exceedances of the 2,600 pounds of photochemically reactive cleanup materials per rolling, 12-month period limitation.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit these reports within 15 days of the discovery of the exceedance. If no exceedance reports have been submitted in the calendar year, the permittee shall submit a statement verifying that no exceedances have occurred during the calendar year. This annual report shall be submitted by January 31 of each year.

- 3. The permittee shall notify TES in writing of any monthly record showing the use of cleanup materials containing HAP. The notification shall include a copy of such record and shall be sent to TES within 30 days following the end of the calendar month.
- 4. The permittee shall also submit annual Synthetic Minor Title V Fee Emissions Reports that specify the total OC and VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year.

**E. Testing Requirements**

- 1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

VOC emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to demonstrate compliance. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings,

Emissions Unit ID: **K001**

respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

PE shall not exceed 1.58 tons per year.

Applicable Compliance Method:

A one-time calculation of the potential to emit based on the following information: maximum coating usage of 12,000 gallons per year; maximum paint density of 8.77 pounds per gallon; maximum solids content of 60%; estimated transfer efficiency of 50%, and estimated dry filtration control efficiency of 90%.

$$12,000 \text{ gal/yr} \times 8.77 \text{ lb/gal} \times 0.6 \times 0.5 \times 0.1 \times \text{ton}/2000 \text{ lb} = 1.58 \text{ tons/yr PE}$$

c. Emission Limitation:

PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

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If required, the permittee shall demonstrate compliance according to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

VOC emissions shall not exceed 22.3 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The Monitoring and Recordkeeping Requirements shall serve as demonstration of compliance with this emission limitation.

This emission limitation was established by adding the maximum annual VOC emissions from coating usage (21.0 tons/yr) to the maximum annual emissions from VOC-containing cleanup materials usage (1.3 tons/yr).

Maximum VOC emissions from coating usage:

$12,000 \text{ gallons/yr} \times 3.5 \text{ lbs VOC/gallon} \times \text{ton}/2000 \text{ pounds} = 21.0 \text{ tons/yr VOC}$

Maximum VOC emissions from VOC-containing cleanup materials usage:

$2,600 \text{ lbs/yr} \times \text{ton}/2000 \text{ lb} = 1.3 \text{ tons/yr}$

e. Emission Limitation:

Visible emissions shall not exceed 20% opacity, unless otherwise specified by the rule.

Applicable Compliance Method:

If required, the methods and procedures outlined under OAC rule 3745-17-03(B)(1) shall be used to demonstrate compliance.

f. Emission Limitation:

Individual HAP shall not exceed 1.6 pounds per gallon of coating.

Applicable Compliance Method:

The permittee may rely on manufacturer's formulation data, if it represents each

Emissions Unit ID: **K001**

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organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it.

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If required, the permittee shall use Method 311(appendix A to 40 CFR part 63) for determining the mass fraction of organic HAP along with the procedure outlined in Section i below to determine the individual HAP content of coating (pounds HAP per gallon).

g. Emission Limitation:

Individual HAP emissions shall not exceed 20 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The recordkeeping requirements of Section C.1 shall serve as demonstration of compliance with this emission limitation.

h. Emission Limitation:

Emissions from any combination of HAP shall not exceed 21.0 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The recordkeeping requirements of Section C.1 shall serve as demonstration of compliance with this emission limitation.

- i. Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791). Multiply the density of the coating (pounds per gallon) by the mass fraction of each organic HAP you count to determine the individual HAP content of the coating (pounds HAP per gallon).

**F. Miscellaneous Requirements**

None