



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: 04-01215**

**DATE: 3/22/00**

Fulton Equipment  
RICHARD PAUL JR  
823 HAMILTON ST  
TOLEDO, OH 43607

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 04-01215**

Application Number: 04-01215  
APS Premise Number: 0448011701  
Permit Fee: **\$400**  
Name of Facility: Fulton Equipment  
Person to Contact: RICHARD PAUL JR  
Address: 823 HAMILTON ST  
TOLEDO, OH 43607

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

**837 Buckingham  
Toledo, Ohio**

Description of proposed emissions unit(s):

**Miscellaneous metal parts coating line.**

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**

**Fulton Equipment**  
**PTI Application: 04-01215**  
**Issued: 3/22/00**

**Facility ID: 0448011701**

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	0.17
volatile organic compounds	1.6

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - miscellaneous metal parts coating line	OAC rule 3745-17-07(B)(1)	visible particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)(3)	see section 2.a.
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating as applied.
	OAC rule 3745-31-05(A)(3)	1.9 pounds particulate (PM) per hour, 0.17 ton PM per year, 18 pounds VOC per hour, and 1.6 tons VOC per year.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B)(3) and OAC rule 3745-21-09(U)(1)(c).

**2. Additional Terms and Conditions**

- 2.a All coating operations will be restricted to an enclosed area. If any mechanical exhaust system is provided for this enclosed area, such equipment shall be operated with an appropriate particulate filtration device.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

The permittee shall collect and record the following information each month for the line:

1. The name and identification number of each coating, as applied.
2. The VOC content of each coating (excluding water and exempt solvents), as applied.

**D. Reporting Requirements**

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.

**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:

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. 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:

18 pounds VOC per hour and 1.6 tons VOC per year,

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment. 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.

3. Emission Limitation:

1.9 pounds particulate (PM) per hour and 0.17 ton PM per year.

Applicable Compliance Method:

These emission limitations are based upon the maximum capacity of the process equipment. 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**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Fulton Equipment**  
**PTI Application: 04-01215**  
**Issued**

**Facility ID: 0448011701**

Emissions Unit ID: **K001**

**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:**

**Fulton Equipment 0448011701 04-1215**

### **Description**

**This permit to install is for an existing spray painting operation, coating custom steel fabrications. A typical product is steel handrails. These products are too large to enclose in a normal paint booth. Fulton proposes to paint in an enclosed area (room) and to utilize compliance coatings.**

### **Applicable regulations**

**OAC rule 3745-17-07(B)(1) - 20% opacity as a 3-minute average**

**OAC rule 3745-17-08(B)(3) - reasonable control**

**OAC rule 3745-21-09(U)(1)(c) - 3.5 lbs VOC/gallon**

**OAC rule 3745-31-05(A)(3) - best available control**

### **BAT determination**

**Due to the large size, but small relative surface area of a railing, a spray booth for control of particulate is considered to be impractical. Due to the small amount of paint applied to the fabrication, relative to the size room needed to spray paint, Fulton is prepared spray in an enclosed room with no forced air ventilation. If a wall fan is ever added for ventilation of VOC fumes, a filtration unit will be required for particulate control. Compliance coatings (<3.5 lbs/gal) will be considered BAT. Fulton will be using airless spray guns. Some touch up painting may be performed by brush. These methods will be considered BAT due to the small amount of coatings applied.**

### **Potential to emit**

**Fulton identifies a maximum annual application rate of 900 gallons/yr. At 3.5 pounds VOC per gallon, this equates to a PTE of 1.6 tons per year. Particulate is estimated based on a transfer efficiency of 25%, a solids content of 5 pounds per gallon, and a 90% effective control by enclosure (or subsequent air filtration) as  $900(.75)(5)(.1) \div 2000 = 0.17$  tpy.**

**Short term limits will be set assuming a maximum application rate of 5 gallons per hour, as: 18 lb VOC/hr and 1.9 lb PM/hr. These usage rates will never actually be attained due to the physical**

**Fulton**  
**PTI A**  
**Issued: 3/22/00**

Emissions Unit ID: **K001**

**restrictions of Fulton's manufacturing process.**

**Permit allowable**

**Allowables will be set at PTE levels = 18 lb VOC/hr, 1.6 tons per year, 1.9 lbs PM/hr and 0.17 tons per year.**

**Actuals**

**Actuals will be estimated at 600 gallons per year and 1 gallon per hour for 3.5 lb VOC/hr, 1.1 tons per year, 0.19 lbs PM/hr and 0.11 tons per year.**

**Other applicable rules: none**

**Fees: minimum process weight x 2 for early start = \$200 x 2 = \$400.**

**Permit To Install Synthetic Minor Write-Up**

**NONE**

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulates	0.17
volatile organic compounds	1.6