



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
CHAMPAIGN COUNTY**

**CERTIFIED MAIL**

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: 05-11553**

**DATE: 5/23/2002**

Rittal Corporation -Urbana  
Diane Rudolph  
One Rittal Place  
Springfield, OH 45504

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

SWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 5/23/2002  
Effective Date: 5/23/2002**

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**FINAL PERMIT TO INSTALL 05-11553**

Application Number: 05-11553  
APS Premise Number: 0511000132  
Permit Fee: **\$200**  
Name of Facility: Rittal Corporation -Urbana  
Person to Contact: Diane Rudolph  
Address: One Rittal Place  
Springfield, OH 45504

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

**801 State Rte 55  
Urbana, Ohio**

Description of proposed emissions unit(s):

**Coated metal enclosures for industrial, electrical, data, etc. component mounting and protection.**

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

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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 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.

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**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	61.2 tpy

**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>	
P001 - Two electro-deposition coating tanks and one cure oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-10(B)
		OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V applicability)
	OAC rule 3745-21-09(U)(1)(c)	

**Rittal****PTI A****Issued: 5/23/2002**Emissions Unit ID: **P001**

<u>Applicable Emissions Limitations/Control Measures</u>	12-month summation of the emissions year
75.5 pounds volatile organic compounds (VOC) per hour	
The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-35-07(B).	
Emissions from natural gas usage in the drying oven from this emissions unit shall not exceed the following:	
0.82 lb NO <sub>x</sub> /hr; 3.6 tons NO <sub>x</sub> /yr; 0.69 lb CO/hr; 3.0 tons CO/yr; 0.015 lb PE/hr (filterable); 0.07 ton PE/yr (filterable); 0.045 lb VOC/hr; and 0.20 ton VOC/yr.	
See A.2.a and A.2.b below.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
61.2 tons VOC as a rolling,	

**2. Additional Terms and Conditions**

- 2.a** The VOC content of coatings employed in the two electro coating dip tanks, shall not exceed 2.64 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average.
- 2.b** Any coating fitting the definition of an extreme performance coating, as in OAC rule 3745-21-01(D)(19), shall not exceed 3.5 pound of VOC per gallon, excluding water and exempt solvents. Coatings applied in this emissions unit that do not meet the definition of an extreme performance coating, shall not exceed 3.0 pounds of VOC per gallon, excluding water and exempt solvents.
- 2.c** The emissions limitation of 75.5 pounds per hour of VOC emissions is based upon potential-to-emit for this emissions unit. Therefore, it is not necessary to establish daily record keeping and reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum annual coating usage for this emissions unit shall not exceed 46,388 gallons based upon a rolling, 12-month summation of the coating usage figures.

To ensure federal enforceability, for 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 Cumulative Coating Usage (gallons)</u>
1	3,865.7
2	7,731.3
3	11,597.0
4	15,462.7
5	19,328.4
6	23,194.0
7	27,059.7
8	30,925.4
9	34,791.0
10	38,656.7
11	42,522.4

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46,388.0

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.

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

1. The permittee shall collect and record the following information each month for both electro coating dip tanks:
  - a. the name and identification number of each material employed in this emissions unit, and documentation of each as being applied as either an extreme performance coating or as a coating not meeting the definition of "extreme performance coating";
  - b. the VOC content, excluding water and exempt solvents, of each material employed in this emissions unit, in pounds per gallon;
  - c. the number of gallons of each material added to the coating tanks, in gallons/month;
  - d. the monthly, volume-weighted average VOC content, excluding water and exempt solvents, of all materials added to both tanks, i.e., the sum of (b) x (c) for all the individual materials, divided by the total number of gallons of materials added to the coating tanks, in pounds per gallon;
  - e. the total gallons of all materials added to the tanks during the month;
  - f. the VOC emissions from both tanks, i.e., summation of the product the VOC content of each material added to the tanks times the gallon usage of each material, i.e.,  $\sum(b) \times (c)$ , or the monthly volume-weighted average VOC content times the monthly coating usage, i.e., (d) x (e), in pounds or tons per month;
  - g. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions;
  - h. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the coating usage (gallons), and the rolling cumulative usage each successive month; and
  - i. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage (gallons).

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**Issued**

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**Emissions Unit ID: P001**

**Issued: 5/23/2002**

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permit to install for this emissions unit, P001, was evaluated based on the actual materials used and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 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):

Pollutant: Acetone

TLV (mg/m<sup>3</sup>): 1,187.1

Maximum Hourly Emission Rate (lbs/hr): 48.3

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,474.0

MAGLC (ug/m<sup>3</sup>): 28,279.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative monthly usage limitation, during the first 12 months of operation following the issuance of this permit (Section B.2). After the first 12 months of operation, the permittee shall submit deviation reports for all exceedances of the rolling, 12-month limitation. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month VOC emissions limitation (61.2 tons) for this emissions unit. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
2. The permittee shall notify the Director (the Ohio EPA Southwest District Office) in writing of any monthly record showing the use of noncomplying coating materials or an exceedance of the monthly volume weighted average VOC content of materials, as follows:

- a. a monthly volume-weighted average of 2.64 pounds of VOC per gallon, excluding water and exempt solvents;
- b. a maximum VOC content of 3.5 pounds per gallon, excluding water and exempt solvents, from extreme performance coatings; and
- c. a maximum VOC content of 3.0 pounds per gallon, excluding water and exempt solvents, for coatings not meeting this definition.

The notification shall include a copy of such records and shall be sent to the Director (the Ohio EPA Southwest District Office) within 30 days following the end of the calendar month.

- 3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

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

- a. Emission Limitation:

75.5 pounds VOC per hour

Applicable Compliance Method:

Compliance shall be determined by the following equation:

$$E_h = G_h * V_c$$

Where:

$E_h$  = maximum VOC emissions per hour

$G_h$  = maximum gallons of coating employed per hour (21.56 gallons per hour)

$V_c$  = coating maximum VOC content, excluding water and exempt solvents (3.5 pounds per gallon)

- b. Emission Limitation:

61.2 tons VOC per year, as a rolling, 12-month summation of the emissions

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 and shall be the summation of the rolling monthly emissions.

c. Emission Limitation:

2.64 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average

Applicable Compliance Method:

Compliance with this limitation shall be based upon the record keeping specified in Section C.1 of this permit. The monthly, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Monthly volume-weighted average =  $[\text{summation of } (G_i \times \text{VOC}_i)] / [\text{summation of } G_i]$   
for  $i = 1$  to  $n$

where:

$i = 1, 2, 3, \dots, n$

$n =$  the total number of the different types of materials added to the dip tank for that month

$G_i =$  the number of gallons of each material "i" added to the dip tanks for that month

$\text{VOC}_i =$  the VOC content of each material "i", in pounds per gallon of material, excluding water and exempt solvents

d. Emission Limitation:

VOC content of 3.5 pounds per gallon, excluding water and exempt solvents, from extreme performance coatings; and

VOC content of 3.0 pounds per gallon, excluding water and exempt solvents, for coatings not meeting the definition of an extreme performance coatings.

Applicable Compliance Method:

Compliance with these limitations shall be based upon the record keeping specified in

Section C.1 of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents of the coating materials added to the electro coating dip tank. 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 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. Emissions from natural gas usage in the drying oven shall not exceed the following:
  - 0.82 lb NO<sub>x</sub>/hr;
  - 3.6 tons NO<sub>x</sub>/yr;
  - 0.69 lb CO/hr;
  - 3.0 tons CO/yr;
  - 0.015 lb PE/hr (filterable);
  - 0.07 ton PE/yr (filterable);
  - 0.045 lb VOC/hr; and
  - 0.20 ton VOC/yr.

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from the drying ovens (8,200 ft<sup>3</sup>/hr) by the emission factors for each pollutant (lbs. of pollutant/MM ft<sup>3</sup>) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to document the annual potential emissions of the oven. Since these limits reflect the potential emissions, no additional compliance determination is required.

#### **F. Miscellaneous Requirements**

None