

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install ~~05-12594~~

A. Source Description

Trutec Industries, Inc. (Trutec) is a medium sized manufacturer of aftermarket automobile products. Based upon potential emissions, Trutec is not a major facility for air pollution emissions. Nevertheless, Trutec believes that the input parameters used to calculate potential emissions for coating operations are highly variable. For this reason, Trutec has requested federally enforceable emission limitations for VOC and HAP to ensure minor source status.

As part of this permit to install, five air contaminant sources have limits on VOC emissions per rolling, 12-month summation in conjunction with rolling, 12-month material usage limitations. To ensure that the rolling, 12-month material usage limitations are effective, each air contaminant source also has limits on VOC content for coating and/or cleanup materials.

In addition, the material usage limitations will inherently limit hazardous air pollutant emissions. Therefore, this synthetic minor permit to install also contains limits on individual and combined hazardous air pollutants with appropriate record keeping requirements.

B. Facility Emissions and Attainment Status

Trutec is located at 4795 Upper Valley Pike, Urbana, Ohio. The City of Urbana is located in Champaign County. At this time, Champaign County is classified as attainment for ozone.

Trutec's facility-wide potential emissions are 97 tons per year for VOC (actual emissions are much less), 6.0 tons per year for an individual HAP (MIBK) and less than 11.0 tons per year for combined HAPs. This synthetic minor permit to install will limit VOC emissions to below 63.0 tons per rolling, 12-month summation.

The VOC emission limitations are accomplished through VOC content limitations in conjunction with rolling, 12-month material usage limitations. To ensure compliance with the aforementioned limitations, the permittee is required to maintain monthly records and submit quarterly deviation reports.

In addition, facility-wide emissions of hazardous air pollutants are required to be less than 10 tons for individual HAPs and 25 tons for combined HAPs. To ensure compliance with the HAP limitation, the permittee is required to maintain monthly records of HAP emissions for the entire facility and to submit quarterly deviation reports.

C. Source Emissions

As mentioned above, each air contaminant source has VOC content and rolling, 12-month material usage limitations. More specifically, each emissions unit is limited as follows:

Emissions unit K001, the main e-coat line, has VOC content limits for both the resin and the paste materials (0.5 lbs VOC/gal and 2.0 lbs VOC/gal, respectively); and rolling, 12-month usage limitations for both the resin and the paste materials (56,285 gallons and 6,494 gallons, respectively). As a result, the VOC emissions from emission unit K001 are effectively limited to 20.57 tons per rolling, 12-month summation.

Emissions unit K002, solid lube spray booth, has VOC content limits for both the coating and cleanup materials (8.0 lbs/gal and 8.58 lbs/gal, respectively); and rolling, 12-month usage limitations for both the coating and the cleanup materials (3,650 gallons and 1,643 gallons, respectively). As a result, the VOC emissions from emissions unit K002 are effectively limited to 14.81 tons per rolling, 12-month summation.

Emissions unit K005, repair spray booth, has VOC content limits for both the coating and cleanup materials (6.1 lbs/gal and 6.8 lbs/gal, respectively); and rolling, 12-month usage limitations for both the coating and the cleanup materials (312 gallons and 73 gallons, respectively). As a result, the VOC emissions from emissions unit K005 are effectively limited to 1.20 tons per rolling, 12-month summation.

Emissions unit K006, small parts e-coat line, has VOC content limits for both the resin and the paste materials (0.5 lbs/gal and 2.0 lbs/gal, respectively); and rolling, 12-month usage limitations for both the resin and the paste materials (47,041 gallons and 5,484 gallons, respectively). As a result, the VOC emissions from emissions unit K006 are effectively limited to 17.24 tons per rolling, 12-month summation.

Emissions unit K007, gecom tumble coating, has VOC content limits for the coatings (6.1 lbs/gal); and a rolling, 12-month coating usage limitation (1,095 gallons). As a result, the VOC emissions from emissions unit K007 are effectively limited to 3.32 tons per rolling, 12-month summation.

D. Conclusion

This synthetic minor permit to install will effectively limit VOC emissions from emissions unit K001, K002, K005, K006 and K007. The combined VOC emissions for these air contaminant sources will be limited to 57.14 tons. As a result, the facility-wide potential VOC emissions will be approximately 65 tons per year.

A combination of VOC content limitations, material usage limitations, monthly record keeping requirements and quarterly deviation reporting requirements shall ensure that compliance with the permit is maintained.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
CHAMPAIGN COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 05-12594

DATE: 6/5/2003

Trutec Industries, Inc.
Dave Vulcan
4795 Upper Valley Pike
Urbana, OH 430789295

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 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 a fee of **\$1400** 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, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

SWDO

IN

CHAMPAIGN COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 05-12594 FOR AN AIR CONTAMINANT SOURCE FOR TRUTEC INDUSTRIES, INC.

On 6/5/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Trutec Industries, Inc.**, located at **4795 Upper Valley Pike, Urbana, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-12594:

Electrodeposition coating line, spray coating line, repair spray coating line, small parts electrodeposition line, batch coating blending tank, and lubricant coating tumbler.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Phil Hinrichs, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 05-12594

Application Number: 05-12594
APS Premise Number: 0511010106
Permit Fee: **To be entered upon final issuance**
Name of Facility: Trutec Industries, Inc.
Person to Contact: Dave Vulcan
Address: 4795 Upper Valley Pike
Urbana, OH 430789295

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4795 Upper Valley Pike
Urbana, Ohio**

Description of proposed emissions unit(s):
Electro deposition coating line, spray coating line, repair spray coating line, small parts electro deposition line, batch coating blending tank, and lubricant coating tumbler.

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

Trutec Industries, Inc.

Facility ID: 0511010106

PTI Application: 05-12594

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

Trutec Industries, Inc.

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B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

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5. 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.

6. 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.

7. 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.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

Trutec Industries, Inc.

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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.

Emissions Unit ID: K001

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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.

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	62.462
PE	2.942
NOx	2.195
CO	1.831
SO2	0.015
OC	68.982(includes VOC)

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Facility ID: 0511010106

Truteo

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Trutek
PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K001 - main e-coat line, electro deposition coating tank and drying oven	OAC rule 3745-31-05(A)(3)
(Terms in this permit supersede those identified in PTI 05-2462, issued 06/24/97).	OAC rule 3745-17-07(A)
	OAC rule 3745-17-10(B)
	OAC rule 3745-18-06(A)
	OAC rule 3745-21-09(U)(1)(i)
	OAC rules 3745-21-08(B) and 3745-23-06(B)
	OAC rule 3745-35-07(B)

**Trutek
PTI A**

Emissions Unit ID: K001

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Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	
The volatile organic compound (VOC) content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-18-06(A), 3745-21-08(B), 3745-21-09(U), 3745-23-06(B), and 3745-35-07(B).
The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3). 0.020 lb PE/mmBtu of actual heat input (for the drying oven)
Organic compound (OC) emissions from cleanup materials shall not exceed 6.52 tons per year.	See A.I.2.b.
Visible particulate emissions (PE) from the stack shall not exceed 5% opacity.	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
<u>Emissions from natural gas combustion</u> in the drying oven shall not exceed: 0.22 lb/hr and 0.95 ton/year for nitrogen oxides (NOx) 0.18 lb/hr and 0.79 ton/year for carbon monoxide (CO) 0.004 lb/hr and 0.018 ton/year for PE 0.02 lb/hr and 0.053 ton/year for VOC 0.001 lb/hr and 0.004 ton/year for sulfur dioxide (SO ₂) See A.I.2.a.	See A.I.2.c. VOC emissions shall not exceed 20.57 tons per rolling, 12-month summation. See A.I.2.d.

Emissions Unit ID: K001

2. Additional Terms and Conditions

- 2.a The emission limitations for PE, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- 2.c The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

II. Operational Restrictions

- 1. The maximum annual resin material usage for this emissions unit shall not exceed 56,285 gallons, based upon a rolling, 12-month summation of the resin material 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 resin material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage, in gallons</u>
1	5,000
1-2	10,000
1-3	15,000
1-4	20,000
1-5	25,000

Trutek
PTI A

Emissions Unit ID: K001

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1-6	30,000
1-7	35,000
1-8	40,000
1-9	45,000
1-10	50,000
1-11	55,000
1-12	56,285

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual resin material usage limitation shall be based upon a rolling, 12-month summation of the resin material usage figures.

2. The maximum annual paste material usage for this emissions unit shall not exceed 6,494 gallons, based upon a rolling, 12-month summation of the paste material 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 paste material usage levels specified in the following table:

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage, in gallons</u>
1	550
1-2	1,100
1-3	1,650
1-4	2,200
1-5	2,750
1-6	3,300
1-7	3,850
1-8	4,400
1-9	4,950
1-10	5,500
1-11	6,050
1-12	6,494

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual paste material usage limitation shall be based upon a rolling, 12-month summation of the paste material usage figures.

3. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the VOC content of each resin material, in pounds per gallon, as employed;
 - b. the volume of each resin material employed, in gallons;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the resin material usage figures, in gallons; also, during the first 12 calendar months of operation following the issuance of this permit,

Emissions Unit ID: K001

- the permittee shall record the cumulative resin material usage for each calendar month, in gallons;
- d. the total VOC emissions from all the resin materials, in tons, i.e., summation of $[(a \times b)/2000]$ for each resin material employed;
 - e. the VOC content of each paste material, in pounds per gallon, as employed;
 - f. the volume of each paste material employed, in gallons;
 - g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the paste material usage figures, in gallons;

also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative paste material usage for each calendar month, in gallons;
 - h. the total VOC emissions from all the paste materials, in tons, i.e., summation of $[(e \times f)/2000]$ for each paste material employed;
 - i. the total VOC emission for the resin and the paste materials employed, in tons, i.e., $(d + h)$; and
 - j. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the VOC emissions for this emissions unit.
3. The permittee shall collect and record the following information each month for this facility:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the individual HAP* content for each coating and cleanup material employed, in pounds per gallon;
 - c. the volume, in gallons, of each coating and cleanup material employed;
 - d. the total individual HAP emission rate, in tons, i.e, the summation of $(b \times c)$ for each coating and cleanup material employed divided by 2000 lbs/ton;
 - e. the total combined HAP emission rate, in tons, i.e., the summation of all individual HAP emissions as determined in (d).
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of each individual HAP emissions for this facility; and
 - m. beginning after the first 12 calendar months of operation following the issuance of this

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permit, the rolling, 12-month summation of the combined HAP emissions for this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons, i.e., summation of $[(b \times c)/2000]$ for each cleanup material employed.
5. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation of 20.57 tons;
 - b. the rolling, 12-month resin material usage limitation of 56,285 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative resin material usage level;
 - c. the rolling, 12-month paste material usage limitation of 6,494 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paste material usage level;
 - d. the rolling, 12-month individual HAP emission limitation of less than 10.0 tons, and/or the combined HAP emission limitation of less than 25.0 tons, for this facility.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of a coating with a VOC content that exceeds the limitation for resin of 0.5 lbs/gal, as employed, the limitation for paste of 2.0 lbs/gal, as employed, and the as applied limitation of 3.0 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office, within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports to Ohio EPA, Southwest District Office, which specify the total OC emissions for cleanup materials from this emissions unit for the previous calendar year (limitation of 6.52 tons/year). These reports shall be submitted by January 31 of each year.
4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, 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.

V. Testing Requirements

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

1. VOC Content Limitation:

The VOC content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.

The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

2. Emission Limitation:

OC emissions shall not exceed 27.09 tons per year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.

3. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

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Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

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0.22 lb/hr and 0.95 ton/year for nitrogen oxides (NO_x)
0.18 lb/hr and 0.79 ton/year for carbon monoxide (CO)
0.004 lb/hr and 0.018 ton/year for particulate emissions (PE)
0.02 lb/hr and 0.06 ton/year for VOC
0.001 lb/hr and 0.01 ton/year for sulfur dioxide (SO₂)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (2,157 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2, revised 7/98: 100 lbs NO_x/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM₁₀/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO₂/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

5. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

6. VOC Content Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section A.III.1. of this permit.

7. Emission Limitation:

VOC emissions shall not exceed 20.57 tons per rolling, 12-month summation.

Trutec Industries, Inc.
PTI Application: 05 12504
Issued

Facility ID: 0511010106

Emissions Unit ID: K001

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

8. Emission Limitation:

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

Applicable Compliance Method:

Compliance with the rolling, 12-month individual and combined HAP emission limitations for this facility shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

9. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

none

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B. State Only Enforceable Section

I. 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 - main e-coat line, electro deposition coating tank and drying oven (Terms in this permit supersede those identified in PTI 05-2462, issued 06/24/97).		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Truteo

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: K001

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

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Maximum Hourly Emission Rate (lbs/hr): 0.56

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 894

MAGLC (ug/m3): 4,881

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.).

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.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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OAC rule 3745-35-07(B)	<u>Applicable Emissions Limitations/Control Measures</u>	3745-23-06(B), and 3745-35-07(B).
	The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 8.0 pounds per gallon, as applied.	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3). 0.020 lb PE/mmBtu of actual heat input (for the bake ovens)
	The VOC content of the cleanup materials employed in this emissions unit shall not exceed 8.58 pounds per gallon, as employed.	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	Particulate emissions (PE) shall not exceed 0.2 pound per hour nor 0.88 tons per year from coating activities. See A.I.2.a.	See A.I.2.b. Coating usage shall not exceed 10 gallons per day.
	Visible PE from the stack shall not exceed 5% opacity.	See A.I.2.c.
	Emissions from natural gas combustion in the bake ovens shall not exceed: 0.04 lb/hr and 0.175 ton/year for nitrogen oxides (NO _x) 0.03 lb/hr and 0.131 ton/year for carbon monoxide (CO) 0.001 lb/hr and 0.004 ton/year for PE 0.002 lb/hr and 0.009 ton/year for VOC 0.0002 lb/hr and 0.001 ton/year for sulfur dioxide (SO ₂) See A.I.2.a.	VOC emissions shall not exceed 14.81 tons per rolling, 12-month summation. See A.I.2.d.
	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-18-06(A), 3745-21-08(B), 3745-21-09(U),	

2. Additional Terms and Conditions

- 2.a** The 0.2 lb PE per hour limitation from coating activities and the emission limitations for PE, SO₂, NO_x, CO and VOC from natural gas combustion in the bake ovens are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The permittee shall employ fabric filters as a control system for PE whenever this emissions unit is in operation.
3. The maximum annual coating usage for this emissions unit shall not exceed 3,650 gallons, based upon a rolling, 12-month summation of the resin material usage figures.

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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 Cumulative Coating Usage, in gallons</u>
1	305
1-2	610
1-3	915
1-4	1,220
1-5	1,525
1-6	1,830
1-7	2,135
1-8	2,440
1-9	2,745
1-10	3,050
1-11	3,355
1-12	3,650

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 figures.

4. The maximum annual cleanup material usage for this emissions unit shall not exceed 1,643 gallons, based upon a rolling, 12-month summation of the cleanup material 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 cleanup material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Cleanup Material Usage, in gallons</u>
1	137
1-2	274
1-3	411
1-4	548
1-5	685
1-6	822

1-7	959
1-8	1,096
1-9	1,233
1-10	1,370
1-11	1,507
1-12	1,643

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual paste material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the VOC content of each coating, as applied, in pounds per gallon;
 - b. the volume of each coating, as applied, in gallons;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures, in gallons;

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, in gallons;
 - d. the VOC emissions for all coatings employed, in tons, i.e., summation of (a x b) for each coating employed divided by 2000 lbs/ton;
 - e. the name and identification of each cleanup material employed;
 - f. the volume, in gallons, of each cleanup material employed;
 - g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the cleanup material usage figures, in gallons;

also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month, in gallons;

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- h. the VOC content, in pounds per gallon, of each cleanup material employed;
 - i. the VOC emissions for all the cleanup materials employed, prior to any credit for recovered materials, in tons, i.e., summation of $(f \times h)$ for each cleanup material employed divided by 2000 lbs/ton;
 - j. the date the recovery tank was emptied;
 - k. the date the materials from the recovery tank were shipped off site;
 - l. the number of gallons of materials from the recovery tank shipped off site;
 - m. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material (a composite sample of all drums is acceptable for purposes of this requirement);
 - n. the VOC from recovered materials, to be credited against the total VOC emissions from the cleanup materials employed, in tons, i.e., summation of $(l \times m)$ for each shipment divided by 2000 lbs/ton;
 - o. the net VOC emissions for all the cleanup materials employed, in tons, i.e., $(i - n)$;
 - p. the total VOC emissions from both the coatings and the cleanup materials employed, in tons, i.e., $(d + o)$; and
 - q. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions for this emissions unit.
- 3. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - 4. The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit is not in service while this emissions unit is operating.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

Emissions Unit ID: K002

- a. the rolling, 12-month VOC emission limitation of 14.81 tons;
- b. the rolling, 12-month coating usage limitation of 3,650 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage level; and
- c. the rolling, 12-month cleanup material usage limitation of 1,643 gallons, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage level.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 10 gallons. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, 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.
4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filter control system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

V. Testing Requirements

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

1. VOC Content Limitation:

8.0 lbs VOC per gallon of coating, as applied
 8.58 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

2. Emission Limitation:

0.2 pound per hour and 0.88 tons per year PE for coating activities

Issued: To be entered upon final issuance

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE from coating activities, the following equation may be used:

$$E = C_s \times (1 - TE) \times (1 - CE)$$

where,

E = PE rate, in pounds per hour

C_s = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The annual PE limitation was established by multiplying the maximum hourly PE limitation by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

3. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Issued: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.04 lb/hr and 0.175 ton/year for nitrogen oxides (NO_x)
0.03 lb/hr and 0.131 ton/year for carbon monoxide (CO)
0.001 lb/hr and 0.004 ton/year for PE
0.002 lb/hr and 0.009 ton/year for VOC
0.0002 lb/hr and 0.001 ton/year for sulfur dioxide (SO₂)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (393 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NO_x/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM₁₀/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO₂/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

5. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

6. Emission Limitation:

VOC emissions shall not exceed 14.81 tons per rolling, 12-month summation.

Trutec Industries, Inc.
PTI Application: 05 12504
Issued

Facility ID: 0511010106

Emissions Unit ID: K002

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

7. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

none

Trutek
PTI A

Emissions Unit ID: K002

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

B. State Only Enforceable Section

I. 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>
K002 - solid lube spray coating booth with four bake ovens (Terms in this permit supersede those identified in PTI 05-5225, issued 06/16/93).		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Truteo

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: K002

Pollutant: N, N - Dimethylacetamide

TLV (mg/m3): 36

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 5.76

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 674

MAGLC (ug/m3): 848

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.).

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.

3. 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.);

Emissions Unit ID: K002

- 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Trutek
PTI A

Emissions Unit ID: K005

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
K005 - coating repair spray booth	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(2)
(Terms in this permit supersede those identified in PTI 05-6111, issued 07/14/93).		OAC rule 3745-21-09(U)(2)(e)
		OAC rule 3745-35-07(B)
	OAC rule 3745-17-07(A)	

**Trutek
PTI A**

Emissions Unit ID: K005

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

Coating usage shall not exceed 3.0 gallons per day.

The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 6.1 pounds per gallon, as applied.

The VOC content of the cleanup materials employed in this emissions unit shall not exceed 6.8 pounds per gallon, as employed.

Particulate emissions (PE) shall not exceed 0.02 pounds per hour nor 0.09 tons per year. See A.I.2.a.

Visible PE shall from the stack shall not exceed 5% opacity.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B)

The visible PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The hourly PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The coating usage limitation established pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

VOC emissions shall not exceed 1.20 tons per rolling, 12-month summation.

See A.I.2.b.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The 0.02 lb PE per hour limitation are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 312 gallons, 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 Cumulative Coating Usage, in gallons</u>
1	26
1-2	52
1-3	78
1-4	104
1-5	130
1-6	156
1-7	182
1-8	208
1-9	234
1-10	260
1-11	286
1-12	312

Trutec Industries, Inc.
PTI Application: 05 12504
Issued

Facility ID: 0511010106

Emissions Unit ID: K005

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 figures.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 73 gallons, 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 cleanup material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Cleanup Material Usage, in gallons</u>
1	6
1-2	12
1-3	18
1-4	24
1-5	30
1-6	36
1-7	42
1-8	48
1-9	54
1-10	60
1-11	66
1-12	73

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

2. The permittee shall employ fabric filters as a control system for PE whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.

Issued: To be entered upon final issuance

2. The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in pounds per gallon;
 - c. the volume of each cleanup material employed, in gallons;
 - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the cleanup material usage figures, in gallons;

also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month, in gallons;
 - e. the VOC emissions for all the cleanup materials employed, in tons, i.e., summation of $[(b \times c)/2000]$ for each cleanup material employed;
 - f. the VOC content of each coating, as applied, in pounds per gallon;
 - g. the volume of each coating, as applied, in gallons;
 - h. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures, in gallons;

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, in gallons;
 - i. the VOC emissions for all coatings employed, in tons, i.e., summation of $[(f \times g)/2000]$ for each coating employed;
 - h. the sum total VOC emissions for all coating and cleanup materials, in tons, i.e., $(e + i)$; and
 - i. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions for this emissions unit.
3. The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit is not in service while this emissions unit is operating.

Issued: To be entered upon final issuance

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation 1.2 tons;
 - b. the rolling, 12-month coating usage limitation of 312 gallons; and
 - c. the rolling, 12-month cleanup material usage limitation of 73 gallons.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 3.0 gallons. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.
3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filter control system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

V. Testing Requirements

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

1. VOC Content Limitation:

6.1 lbs VOC/gallon of coating, as applied

6.8 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

Trutec Industries, Inc.
PTI Application: 05 12504
Issued

Facility ID: 0511010106

Emissions Unit ID: K005

2. Emission Limitation:

0.020 lb PE per hour and 0.09 tons PE per year from coating activities

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Applicable Compliance Method:

To determine the actual worst-case emission rate for PE, the following equation may be used:

$$E = C_s \times (1 - TE) \times (1 - CE)$$

where,

E = PE rate, in pounds per hour

C_s = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The annual PE limitation was established by multiplying the maximum hourly PE limitation by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

3. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. Emission Limitation:

VOC emissions shall not exceed 1.2 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the

Issued: To be entered upon final issuance

record keeping requirements established in Section A.III.2. of this permit.

5. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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>
K005 - coating repair spray booth (Terms in this permit supersede those identified in PTI 05-6111, issued 07/14/93).		

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K005 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Trutec Industries, Inc.
PTI Application: 05 12504
Issued

Facility ID: 0511010106

Emissions Unit ID: K005

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 590

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,274

MAGLC (ug/m3): 14,048

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.).

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.

3. 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.);

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- 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Trutek
PTI A

Emissions Unit ID: K006

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K006 - small parts e-coat line, electro deposition and drying oven (Terms in this permit supersede those identified in PTI 05-8258, issued 10/23/96).	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(A) OAC rule 3745-17-10(B) OAC rule 3745-18-06(A) OAC rule 3745-21-09(U)(1)(i) OAC rules 3745-21-08(B) and 3745-23-06(B) OAC rule 3745-35-07(B)

Trutec Industries, Inc.
PTI Application: 05-12504
Issued

Facility ID: 0511010106

Emissions Unit ID: K006

Applicable Emissions
Limitations/Control
Measures

The volatile organic compound (VOC) content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.

The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.

Visible particulate emissions (PE) from the stack shall not exceed 5% opacity.

Emissions from natural gas combustion in the drying oven shall not exceed:
 0.25 lb/hr and 1.07 ton/year for nitrogen oxides (NO_x)
 0.21 lb/hr and 0.91 ton/year for carbon monoxide (CO)
 0.005 lb/hr and 0.02 ton/year for PE
 0.02 lb/hr and 0.06 ton/year for VOC
 0.002 lb/hr and 0.01 ton/year for sulfur dioxide (SO₂)
 See A.I.2.a.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-18-06(A), 3745-21-08(B), 3745-23-06(B), and 3745-35-07(B).

The visible PE limitation

specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

See A.I.2.b.

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

See A.I.2.c.

VOC emissions shall not exceed 17.24 tons per rolling, 12-month summation.

See A.I.2.d.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The emission limitations for PE, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

II. Operational Restrictions

1. The maximum annual resin material usage for this emissions unit shall not exceed 47,041 gallons, based upon a rolling, 12-month summation of the resin material usage figures.

Emissions Unit ID: K006

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Resin Material Usage, in gallons</u>
1	3,920
1-2	7,840
1-3	11,760
1-4	15,680
1-5	19,600
1-6	23,520
1-7	27,440
1-8	31,360
1-9	35,280
1-10	39,200
1-11	43,120
1-12	47,041

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual resin material usage limitation shall be based upon a rolling, 12-month summation of the resin material usage figures.

- The maximum annual paste material usage for this emissions unit shall not exceed 5,484 gallons, based upon a rolling, 12-month summation of the paste material 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 paste material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Paste Material Usage, in gallons</u>
1	457
1-2	914
1-3	1,371
1-4	1,828
1-5	2,285
1-6	2,742
1-7	3,199
1-8	3,656
1-9	4,113
1-10	4,570

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1-11	5,027
1-12	5,484

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual paste material usage limitation shall be based upon a rolling, 12-month summation of the paste material usage figures.

3. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the VOC content of each resin material, as employed;
 - b. the volume of resin material employed, in gallons;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the resin material usage figures;

also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative resin material usage for each calendar month;
 - d. the VOC emissions for the resin materials employed, in tons, i.e., summation of (a x b) for each resin material employed divided by 2000 lbs/ton;
 - e. the VOC content of each paste material, as employed;
 - f. the volume of paste material employed, in gallons;
 - g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the paste material usage figures;

also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative paste material usage for each calendar month;

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- h. the VOC emissions for the paste materials employed, in tons, i.e., summation of (e x f) for each paste material employed divided by 2000 lbs/ton;
 - i. the total VOC emissions for both the resin materials and the paste materials, in pounds or tons (d + h); and
 - j. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the VOC emissions for this emissions unit.
3. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation;
 - b. the rolling, 12-month resin material usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative resin material usage level; and
 - c. the rolling, 12-month paste material usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paste material usage level.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

2. The permittee shall notify Ohio EPA, Southwest District Office, 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 Ohio EPA, Southwest District Office, within 30 days following the end of the calendar month.
3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, 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.

V. Testing Requirements

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

1. VOC Content Limitation:

The VOC content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.

The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

2. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.25 lb/hr and 1.07 ton/year for nitrogen oxides (NO_x)

0.21 lb/hr and 0.91 ton/year for carbon monoxide (CO)

0.005 lb/hr and 0.02 ton/year for PE

0.02 lb/hr and 0.06 ton/year for VOC

0.01 lb/hr and 0.01 ton/year for sulfur dioxide (SO₂)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (2,451 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NO_x/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM10/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO₂/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the

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result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

5. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

6. VOC Content Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in Section A.III.1. of this permit.

7. Emission Limitation:

VOC emissions shall not exceed 17.24 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

8. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

none

Trutec Industries, Inc.
 PTI Application: 05-12504
 Issued

Facility ID: 0511010106

Emissions Unit ID: K006

B. State Only Enforceable Section

I. 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>
K006 - small parts e-coat line, electro deposition and drying oven (Terms in this permit supersede those identified in PTI 05-8258, issued 10/23/96).		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K006 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

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Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 894

MAGLC (ug/m3): 4,881

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.).

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.

3. 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.);

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Issued

Facility ID: 0511010106

Emissions Unit ID: K006

- 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K007 - gecom tumbler, tumble coating	OAC rule 3745-31-05(A)(3)	Coating usage shall not exceed 3.0 gallons per day. The VOC content of the coatings employed in this emissions unit shall not exceed 6.1 pounds per gallon, as applied. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(2)(e)	The coating usage limitation established pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B)	VOC emissions shall not exceed 3.32 tons per rolling, 12-month summation. See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs,

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based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

II. Operational Restrictions

The maximum annual coating usage for this emissions unit shall not exceed 1,095 gallons, 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 resin material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage, in gallons</u>
1	94
1-2	184
1-3	276
1-4	368
1-5	460
1-6	552
1-7	644
1-8	736
1-9	828
1-10	920
1-11	1,012
1-12	1,095

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 figures.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

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- a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the name and identification of each coating, as applied;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the volume of each coating employed, in gallons;
 - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating 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;
 - e. the total VOC emissions for all coatings employed, in tons, i.e., summation of (b x c) for each coating employed divided by 2000 lbs/ton; and
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month VOC emission limitation of 3.32 tons; and
 - b. the rolling, 12-month coating usage limitation of 1,095 gallons.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the coating line employs more than the applicable maximum daily

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coating usage limit of 3 gallons. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.

V. Testing Requirements

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

1. Emission Limitation:

6.1 pounds of VOC per gallon of coating, as applied

Applicable Compliance Method:

Compliance with the coating VOC content limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

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2. Emission Limitation:

VOC emissions shall not exceed 3.51 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

None

Trutek

PTI A

Emissions Unit ID: K007

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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>
K007 - gecom tumbler, tumble coating		

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K007 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,274

MAGLC (ug/m3): 14,048

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.).

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.

3. 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.

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Truteo

PTI A

Emissions Unit ID: K007

Issued: To be entered upon final issuance

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Trutek
PTI A

Emissions Unit ID: P004

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
P004 - hydrophilic mixing tank, 300 gallon stainless steel tank for batch mixing	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 28.5 pounds per day nor 5.2 tons per year.
(Terms in this permit supersede those identified in PTI 05-5560, issued 07/29/92).		Particulate emissions (PE) shall not exceed 10.7 pounds per day nor 2.0 tons PE per rolling, 12-month summation.
		Visible PE from the stack shall not exceed 5% opacity.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
		See A.I.2.a.
	OAC rule 3745-21-07(G)(2)	See A.I.2.b
	OAC rule 3745-35-07(B)	See A.I.2.c

2. Additional Terms and Conditions

- 2.a The daily emission limitations for VOC, 28.5 pounds, and for PE, 10.7 pounds, are established to reflect potential to emit for this emissions unit. Therefore, it is not necessary

Emissions Unit ID: P004

to establish record keeping and reporting requirements to ensure compliance with these limitations.

- 2.b** The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- 2.c** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

The record keeping and reporting requirements to ensure compliance with these HAP emission limitations are contained in the Terms and Conditions for emissions unit K001. Therefore, it is not necessary to establish record keeping and reporting requirements for this emissions unit. If compliance with the rolling, 12-month individual HAP and combined HAP emission limitations are demonstrated for this facility, then compliance is demonstrated for this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the name and identification of each solvent material, as employed; and
 - b. whether or not each liquid organic solvent material employed is a photochemically reactive material.
2. The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the number of pounds of each solid material employed;
 - b. the total PE rate for all solids employed, in pounds, i.e., (a)x(0.01, loss factor*);

*The 1%, by weight, loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.
 - c. the number of pounds of all solvent materials employed;
 - d. the total VOC emission rate for all solvents employed, in pounds, i.e., (d)(0.02, solvent loss factor*);

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*The 2%, by weight, solvent loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

IV. Reporting Requirements

1. The permittee shall submit annual reports to Ohio EPA, Southwest District Office, which specify the total VOC emissions (limitation of 5.2 tons/year) and the total particulate emissions (limitation of 2.0 tons). These reports shall be submitted by January 31 of each year.
2. The permittee shall notify Ohio EPA, Southwest District Office, 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 Ohio EPA, Southwest District Office, within 30 days following the end of the calendar month.

V. Testing Requirements

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

1. Emission Limitation:

28.5 lbs VOC per day

Applicable Compliance Method:

The daily VOC emission rate was derived by multiplying the maximum solvent usage rate per batch, 475 pounds, by the maximum batches per day, three, then multiplying the product by the solvent loss factor of 2%. The 2%, by weight, solvent loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

2. Emission Limitation:

5.2 tons VOC per year

2.0 tons PE per year

Applicable Compliance Method:

Compliance with the annual VOC and PE limitations shall be determined through the record keeping requirement established in Section A.III.2. of this permit.

3. Emission Limitation:

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10.7 lbs PE per day

Applicable Compliance Method:

The daily PE rate was derived by multiplying the maximum solids usage rate per batch, 365 pounds, by the maximum batches per day, three, and then multiplying the product by the particulate emission loss factor of 1%. The 1%, by weight, loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

4. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

5. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>
P004 - hydrophilic mixing tank, 300 gallon stainless steel tank for batch mixing (Terms in this permit supersede those identified in PTI 05-5560, issued 07/29/92).		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for this emissions unit P004 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m3): 1,884

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 150

MAGLC (ug/m3): 44,863

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.).

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.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None