



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 05-12867**

**DATE: 9/11/2003**

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

SWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 9/11/2003  
Effective Date: 9/11/2003**

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**FINAL PERMIT TO INSTALL 05-12867**

Application Number: 05-12867  
APS Premise Number: 0511010106  
Permit Fee: **\$200**  
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):  
**Small metal parts coating for cylinder paint machines.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

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**14. Construction Compliance Certification**

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

**15. Fees**

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	14.49
PE	0.06

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

3745-17-11(B)(2)

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

K008 - Cylinder paint machine

OAC rule 3745-31-05(A)(3)

OAC rule 3745-21-09(U)(2)(e)

OAC rule 3745-17-07(A),

Applicable Emissions  
Limitations/Control Measures

The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 7.91 pounds per gallon, as applied.

The VOC content of the cleanup materials employed in this emissions unit shall not exceed 8.58 pounds per gallon, as employed.

The VOC emissions shall not exceed 14.49 tons per year.

Particulate emissions (PE) shall not exceed 0.02 pound per hour nor 0.06 tons per year from coating activities. See A.I.2.a.

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

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U).

The limitations specified by these rules are less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).

The daily coating usage shall not exceed 10.0 gallons.

**2. Additional Terms and Conditions**

- 2.a** The 0.02 lb PE per hour limitation from coating activities 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 this limitation.

**B. Operational Restrictions**

The permittee shall employ particulate filter panels as a control system for PE whenever this emissions unit is in operation.

**C. 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 name and identification of each cleanup material employed;
  - c. the volume, in gallons, of each cleanup material employed;
  - d. the VOC content, in pounds per gallon, of each cleanup material employed;
  - e. the VOC emissions for all the cleanup materials employed, prior to any credit for recovered materials, in tons, i.e., summation of © x d) for each cleanup material employed divided by 2000 lbs/ton;
  - f. the date the recovery tank was emptied;
  - g. the date the materials from the recovery tank were shipped off site;
  - h. the number of gallons of materials from the recovery tank shipped off site;

- i. 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);
  - j. the VOC from recovered materials, to be credited against the total VOC emissions from the cleanup materials employed, in tons, i.e., summation of (h x i) for each shipment divided by 2000 lbs/ton;
  - k. the net VOC emissions for all the cleanup materials employed, in tons, i.e., (e - j); and
  - l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall maintain records that document any time periods when the particulate filter panels serving this emissions unit are not in service while this emissions unit is operating.

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

1. The permittee shall notify Ohio EPA, Southwest District Office in writing of any monthly record showing the use of any coating or cleanup material that exceeds the VOC content limitations of 7.91 lbs/gal and 8.58 lbs/gal, respectively. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 45 days following the end of the calendar month.
2. The permittee shall notify Ohio EPA, Southwest District Office in writing of any daily record showing that the coating line employed more than 10 gallons of coating per day. 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 particulate filter panels were not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 45 days after the event occurs.
4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

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Emissions Unit ID: **K008**

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

1. VOC Content Limitation:

7.91 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 II.C.2. of this permit.

2. Emission Limitation:

VOC emissions shall not exceed 14.49 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined through the record keeping requirements established in Section II.C.2. of this permit. The annual VOC emissions are the sum of the monthly VOC emissions for the calendar year.

To determine the monthly VOC emissions from this emissions unit, the following equation may be used:

$$E = [(C)(C_{voc}) + (Cl)(Cl_{voc}) - (R)(R_{voc})] \div (2000 \text{ lbs/ton})$$

E = VOC emissions rate, in tons per month

C = monthly coating, in gallons

C<sub>voc</sub> = maximum coating VOC content of 7.91 lbs/gallon

Cl = monthly cleanup material usage, in gallons

Cl<sub>voc</sub> = maximum cleanup material VOC content of 8.58 lbs/gallon

R = the number of gallons of materials from the recovery tank shipped off site, in gallons

R<sub>voc</sub> = the VOC content of the material shipped off-site

3. Emission Limitation:

0.02 pound per hour and 0.06 ton per year PE for coating activities

Applicable Compliance Method:

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

$$E = Cs(1 - TE)(1 - CE)$$

where,

E = PE rate, in pounds per hour

Cs = 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 a similar equation with a maximum annual coating usage of 3,650 gallons, based upon 10 gallons per day and 365 days e per year. The resulting pounds of PE per year is then converted to tons by dividing by 2000 lbs/ton.

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.

**F. Miscellaneous Requirements**

None