☒ Synthetic Minor Determination and/or ☐ Netting Determination

Permit To Install 05-10368

Baumfolder Corp

A. Source Description

The Baumfolder Corporation (permittee) has applied for a PTI for 6 coating booths. Each coating booth is used to apply primer and paint to paper folding machines. The majority of the paper folding machines are metal. However, the permittee requested the flexibility to coat both metal and non-metal parts, including parts containing both metal and non-metal.

When coating metal parts, the permittee will comply with the SIP limitation by employing less than 10 gallons of coating per day. When coating non-metal parts or parts with both metal and non-metal, the permittee will comply with the SIP limitations by employing less than 10 gallons of coating per day and limiting hourly and daily VOC emissions to 8 pounds and 40 pounds, respectively, including photochemically reactive cleanup materials.

Three of the coating booths are conveyorized and employ a drying oven (not exceeding 200 deg F), and the other 3 booths are manually operated and do not employ a drying oven.

B. Facility Emissions and Attainment Status

The Baumfolder Corporation (permittee) finishes and assembles paper folding machines. The permittee is located at 1660 Campbell Road, Sidney, Shelby County. The permittee has applied for a Synthetic Minor PTI for 6 coating booths. The location of the proposed facility is attainment for all criteria pollutants.

The coating booths are currently the only air contaminant sources at this facility. The combined potential-to-emit (PTE) for the 6 coating booths is 69.6 tons VOC per year, 18 tons for an individual HAP (MEK) per year (all other individual HAPs are below 10 TPY), and 29.2 tons per year of combined HAPs. The actual emissions for the 6 booths combined are well below the PTE figures.

C. Source Emissions

Based upon the 10 gallons of coating per day limitation, each of the coating booths has a PTE of VOC of 11..6 TPY, 3.0 TPY individual HAP, 4.87 TPY combined HAPs. The combined PTE for the 6 coating booths is therefore 69.6 TPY VOC, 18.0 TPY for an individual HAP and 29.2 TPY for combined HAPs. By limiting usage of one solvent, the Wash Primer Catalytic Reducer (Product Number R7K44), for the entire facility, the facility-wide PTE for an individual HAP is less than 8.0 TPY and for combined HAPs is less than 15.0 TPY. Consequently, the emissions from each individual booth will be less than the aforementioned figures.

The Wash Primer Catalytic Reducer is used both as a thinner and a cleanup material.

D. Conclusion

The Synthetic Minor PTI will effectively restrict the facility-wide Wash Primer Catalytic Reducer usage as a rolling, 12-month summation. In addition, the PTI will limit individual HAP emissions below 10.0 TPY and combined HAPs emissions below 25.0 TPY as rolling, 12-month summations.

A combination of the usage limitation and monthly record keeping requirements with quarterly deviation reporting requirements shall ensure that compliance with the permit is achieved.

State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
SHELBY COUNTY
Application No: 05-10368
DATE: 9/14/2000

Baumfolder Corp.
Janis Benanzer
1660 Campbell Road
Sidney, OH 45365

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 of 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 **$1200** 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,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **SWDO** **IN**

DRAFT PERMIT TO INSTALL 05-10368

Application Number:	05-10368
APS Premise Number:	0575010020
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Baumfolder Corp.
Person to Contact:	Janis Benanzer
Address:	1660 Campbell Road Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:
1660 Campbell Road
Sidney, **Ohio**

Description of proposed emissions unit(s):
6 Paint Booths for the coating of metal parts for folding 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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

Pollutant	Tons Per Year
VOC	69.6

Emissions Unit ID: **K001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
K001 - Paint Booth #1 - metal and non-metal parts coating with drying oven	OAC rule 3745-31-05(A)(3)
miscellaneous metal parts coating	OAC rule 3745-21-09(U)(2)(e)(iii)
non-metal parts coating	OAC rule 3745-21-07(G)(2)

OAC rule 3745-35-07(B)	Applicable Emissions Limitations/Control Measures
	62.4 lbs/day, excluding cleanup materials, when coating metal parts; and 11.6 TPY VOC, including cleanup materials, as a rolling, 12-month summation.
	VOC content exemption, based upon maximum daily coating usage not exceeding 10 gallons per day when coating metal and/or non-metal parts.
	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts.
	See Section A.2.b
	The requirement established pursuant to this rule is less stringent than the requirement of OAC rule 3745-31-05(A)(3).
	Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts.
	See Section A.2.b

2. Additional Terms and Conditions

2.a The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

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 shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs, as a rolling, 12-month summation.

B. Operational Restrictions

The maximum annual Wash Primer Catalyst Reducer, Product Number R7K44, shall not exceed 4,000 gallons, as a rolling, 12-month summation for this entire facility. This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY.

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a.. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit <u>when coating non-metal parts</u>:

   a. The company identification for each coating and photochemically reactive cleanup material employed.

   b. The number of gallons of each coating and photochemically reactive cleanup material employed.

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

a.. The name and identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

a.. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month.

b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

* A listing of Hazardous Air Pollutants (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 air agency contact.

6. 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:

Pollutant: Calcium Carbonate

TLV (mg/m3): 10

Maximum Hourly Emission Rate (lbs/hr): 1.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 144.1

MAGLC (ug/m3): 238.0

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.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour <u>when coating non-metal parts</u>, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day <u>when coating non-metal parts</u>, and the actual organic compound emissions for each such day.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I -

General Terms and Conditions of this permit under Section (A)(2).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation;

   b. the rolling, 12-month individual HAP emission limitation; and

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation -

   62.4 pounds of volatile organic compounds per day, excluding cleanup materials

   Applicable Compliance Method -

   Compliance shall be determined by multiplying the coating VOC content (maximum of 6.24 lbs/gal), as applied, by the daily coating usage (maximum of 10 gal/day).

2. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.1.

3. Emission Limitation -

8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

5. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

6. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

7. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

8. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K002 - Paint Booth #2 - metal and non-metal parts coating with drying oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B)
miscellaneous metal parts coating	OAC rule 3745-21-09(U)(2)(e)(iii)	
non-metal parts coating	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures
62.4 lbs/day, excluding cleanup materials, when coating metal parts; and 11.6 TPY VOC, including cleanup materials, as a rolling, 12-month summation.
VOC content exemption, based upon maximum daily coating usage not exceeding 10 gallons per day when coating metal and/or non-metal parts.
The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts.
See Section A.2.b
The requirement established pursuant to this rule is less stringent than the requirement of OAC rule 3745-31-05(A)(3).
Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts.
See Section A.2.b

2. Additional Terms and Conditions

2.a The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

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 shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs, as a rolling, 12-month summation.

B. Operational Restrictions

The maximum annual Wash Primer Catalyst Reducer, Product Number R7K44, shall not exceed 4,000 gallons, as a rolling, 12-month summation for this entire facility. This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY.

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a.. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit <u>when coating non-metal parts</u>:

   a. The company identification for each coating and photochemically reactive cleanup material employed.

   b. The number of gallons of each coating and photochemically reactive cleanup material employed.

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

a.. The name and identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

a.. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month.

b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

* A listing of Hazardous Air Pollutants (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 air agency contact.

6. 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:

   Pollutant: Calcium Carbonate

   TLV (mg/m3): 10

   Maximum Hourly Emission Rate (lbs/hr): 1.6

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 144.1

   MAGLC (ug/m3): 238.0

   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.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour <u>when coating non-metal parts</u>, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day <u>when coating non-metal parts</u>, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation;

   b. the rolling, 12-month individual HAP emission limitation; and

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation -

   62.4 pounds of volatile organic compounds per day, excluding cleanup materials

   Applicable Compliance Method -

   Compliance shall be determined by multiplying the coating VOC content (maximum of 6.24 lbs/gal), as applied, by the daily coating usage (maximum of 10 gal/day).

2. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.1.

3. Emission Limitation -

8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

5. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

6. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

7. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

8. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K003 - Paint Booth #3 - metal and non-metal parts coating with drying oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B)
miscellaneous metal parts coating	OAC rule 3745-21-09(U)(2)(e)(iii)	
non-metal parts coating	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
62.4 lbs/day, excluding cleanup materials, when coating metal parts; and 11.6 TPY VOC, including cleanup materials, as a rolling, 12-month summation.	
VOC content exemption, based upon maximum daily coating usage not exceeding 10 gallons per day when coating metal and/or non-metal parts.	
The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts.	
See Section A.2.b	
The requirement established pursuant to this is less stringent than the requirement of OAC rule 3745-31-05(A)(3).	
Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts.	
See Section A.2.b	

2. Additional Terms and Conditions

2.a The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary

to develop record keeping and reporting requirements to ensure compliance with this limit.

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 shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs, as a rolling, 12-month summation.

B. Operational Restrictions

The maximum annual Wash Primer Catalyst Reducer, Product Number R7K44, shall not exceed 4,000 gallons, as a rolling, 12-month summation for this entire facility. This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY.

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a.. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit <u>when coating non-metal parts</u>:

   a. The company identification for each coating and photochemically reactive cleanup material employed.

   b. The number of gallons of each coating and photochemically reactive cleanup material employed.

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all coatings and photochemically reactive

cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

a.. The name and identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

a.. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month.

b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

* A listing of Hazardous Air Pollutants (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 air agency contact.

6. 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:

   Pollutant: Calcium Carbonate

   TLV (mg/m3): 10

   Maximum Hourly Emission Rate (lbs/hr): 1.6

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 144.1

   MAGLC (ug/m3): 238.0

   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.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour <u>when coating non-metal parts</u>, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day <u>when coating non-metal parts</u>, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation;

   b. the rolling, 12-month individual HAP emission limitation; and

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation -

   62.4 pounds of volatile organic compounds per day, excluding cleanup materials

   Applicable Compliance Method -

   Compliance shall be determined by multiplying the coating VOC content (maximum of 6.24 lbs/gal), as applied, by the daily coating usage (maximum of 10 gal/day).

2. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.1.

3. Emission Limitation -

8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

5. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

6. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

7. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

8. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
K004 - Paint Booth #4 - metal and non-metal parts coating without drying oven	OAC rule 3745-31-05(A)(3)
miscellaneous metal parts coating	OAC rule 3745-21-09(U)(2)(e)(iii)
non-metal parts coating	OAC rule 3745-21-07(G)(2)

	Applicable Emissions Limitations/Control Measures
OAC rule 3745-35-07(B)	62.4 lbs/day, excluding cleanup materials, when coating metal parts; and 11.6 TPY VOC, including cleanup materials, as a rolling, 12-month summation. VOC content exemption, based upon maximum daily coating usage not exceeding 10 gallons per day when coating metal and/or non-metal parts. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts. See Section A.2.b The requirement established pursuant to this is less stringent than the requirement of OAC rule 3745-31-05(A)(3). Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts. See Section A.2.b

2. Additional Terms and Conditions

2.a The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

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 shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs, as a rolling, 12-month summation.

B. Operational Restrictions

The maximum annual Wash Primer Catalyst Reducer, Product Number R7K44, shall not exceed 4,000 gallons, as a rolling, 12-month summation for this entire facility. This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY.

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a.. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit <u>when coating non-metal parts</u>:

   a. The company identification for each coating and photochemically reactive cleanup material employed.

   b. The number of gallons of each coating and photochemically reactive cleanup material employed.

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

a.. The name and identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

a.. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month.

b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

* A listing of Hazardous Air Pollutants (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 air agency contact.

6. 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:

Pollutant: Calcium Carbonate

TLV (mg/m3): 10

Maximum Hourly Emission Rate (lbs/hr): 1.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 144.1

MAGLC (ug/m3): 238.0

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.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour <u>when coating non-metal parts</u>, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day <u>when coating non-metal parts</u>, and the actual organic compound emissions for each such day.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I -

General Terms and Conditions of this permit under Section (A)(2).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation;

   b. the rolling, 12-month individual HAP emission limitation; and

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation -

   62.4 pounds of volatile organic compounds per day, excluding cleanup materials

   Applicable Compliance Method -

   Compliance shall be determined by multiplying the coating VOC content (maximum of 6.24 lbs/gal), as applied, by the daily coating usage (maximum of 10 gal/day).

2. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

   Compliance shall be based upon the record keeping as specified in Section C.1.

3. Emission Limitation -

8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

5. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

6. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

7. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

8. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K005 - Paint Booth #5 - metal and non-metal parts coating without drying oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B)
miscellaneous metal parts coating	OAC rule 3745-21-09(U)(2)(e)(iii)	
non-metal parts coating	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
62.4 lbs/day, excluding cleanup materials, when coating metal parts; and 11.6 TPY VOC, including cleanup materials, as a rolling, 12-month summation.	
VOC content exemption, based upon maximum daily coating usage not exceeding 10 gallons per day when coating metal and/or non-metal parts.	
The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts.	
See Section A.2.b	
The requirement established pursuant to this rule is less stringent than the requirement of OAC rule 3745-31-05(A)(3).	
Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts.	
See Section A.2.b	

2. Additional Terms and Conditions

2.a The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary

to develop record keeping and reporting requirements to ensure compliance with this limit.

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 shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs, as a rolling, 12-month summation.

B. Operational Restrictions

The maximum annual Wash Primer Catalyst Reducer, Product Number R7K44, shall not exceed 4,000 gallons, as a rolling, 12-month summation for this entire facility. This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY..

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a.. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit <u>when coating non-metal parts</u>:

   a. The company identification for each coating and photochemically reactive cleanup material employed.

   b. The number of gallons of each coating and photochemically reactive cleanup material employed.

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all coatings and photochemically reactive

cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

a.. The name and identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

a.. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month.

b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

* A listing of Hazardous Air Pollutants (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 air agency contact.

6. 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:

   Pollutant: Calcium Carbonate

   TLV (mg/m3): 10

   Maximum Hourly Emission Rate (lbs/hr): 1.6

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 144.1

   MAGLC (ug/m3): 238.0

   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.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour <u>when coating non-metal parts</u>, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day <u>when coating non-metal parts</u>, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation;

   b. the rolling, 12-month individual HAP emission limitation; and

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation -

   62.4 pounds of volatile organic compounds per day, excluding cleanup materials

   Applicable Compliance Method -

   Compliance shall be determined by multiplying the coating VOC content (maximum of 6.24 lbs/gal), as applied, by the daily coating usage (maximum of 10 gal/day).

2. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.1.

3. Emission Limitation -

8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

5. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

6. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

7. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

8. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. Miscellaneous Requirements

none

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K006 - Paint Booth #6 - metal and non-metal parts coating without drying oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B)
miscellaneous metal parts coating	OAC rule 3745-21-09(U)(2)(e)(iii)	
non-metal parts coating	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures
62.4 lbs/day, excluding cleanup materials, when coating metal parts; and 11.6 TPY VOC, including cleanup materials, as a rolling, 12-month summation.
VOC content exemption, based upon maximum daily coating usage not exceeding 10 gallons per day when coating metal and/or non-metal parts.
The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts.
See Section A.2.b
The requirement established pursuant to this rule is less stringent than the requirement of OAC rule 3745-31-05(A)(3).
Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts.
See Section A.2.b

2. Additional Terms and Conditions

2.a The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.

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 shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs, as a rolling, 12-month summation.

B. Operational Restrictions

The maximum annual Wash Primer Catalyst Reducer, Product Number R7K44, shall not exceed 4,000 gallons, as a rolling, 12-month summation for this entire facility. This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY.

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a.. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit <u>when coating non-metal parts</u>:

   a. The company identification for each coating and photochemically reactive cleanup material employed.

   b. The number of gallons of each coating and photochemically reactive cleanup material employed.

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

a.. The name and identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

a.. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month.

b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

* A listing of Hazardous Air Pollutants (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 air agency contact.

6. 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:

Pollutant: Calcium Carbonate

TLV (mg/m3): 10

Maximum Hourly Emission Rate (lbs/hr): 1.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 144.1

MAGLC (ug/m3): 238.0

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.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour <u>when coating non-metal parts</u>, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day <u>when coating non-metal parts</u>, and the actual organic compound emissions for each such day.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I -

General Terms and Conditions of this permit under Section (A)(2).

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation;

   b. the rolling, 12-month individual HAP emission limitation; and

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation -

   62.4 pounds of volatile organic compounds per day, excluding cleanup materials

   Applicable Compliance Method -

   Compliance shall be determined by multiplying the coating VOC content (maximum of 6.24 lbs/gal), as applied, by the daily coating usage (maximum of 10 gal/day).

2. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

   Compliance shall be based upon the record keeping as specified in Section C.1.

3. Emission Limitation -

8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

5. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

6. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

7. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

8. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. Miscellaneous Requirements

none

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

SIC CODE 3554 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Paint Booth #1 - metal and non-metal parts coating with drying oven

DATE INSTALLED 12/83

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with applicable emission limitations, employing less than 10 gallons of coating per day, Wash Primer Catalytic Reducer usage not to exceed 4,000 gallon per year for the entire facility, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Calcium Carbonate

8315.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

SIC CODE 3554 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Paint Booth #2 - metal and non-metal parts coating with drying oven

DATE INSTALLED 12/83

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with applicable emission limitations, employing less than 10 gallons of coating per day, Wash Primer Catalytic Reducer usage not to exceed 4,000 gallon per year for the entire facility, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Calcium Carbonate

8315.wpd

NEW SC
PTI Num
FACILIT
Emissions Unit ID: **K006**
FACILITY DESCRIPTION 6 Paint Booths for the coating of metal parts for folding machines. CITY/TWP Sidney
SIC CODE 3554 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K003
EMISSIONS UNIT DESCRIPTION Paint Booth #3 - metal and non-metal parts coating with drying oven
DATE INSTALLED 12/83

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with applicable emission limitations, employing less than 10 gallons of coating per day, Wash Primer Catalytic Reducer usage not to exceed 4,000 gallon per year for the entire facility, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Calcium Carbonate

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

SIC CODE 3554 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Paint Booth #4 - metal and non-metal parts coating without drying oven

DATE INSTALLED 12/83

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with applicable emission limitations, employing less than 10 gallons of coating per day, Wash Primer Catalytic Reducer usage not to exceed 4,000 gallon per year for the entire facility, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Calcium Carbonate

8315.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

SIC CODE 3554 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K005

EMISSIONS UNIT DESCRIPTION Paint Booth #5 - metal and non-metal parts coating without drying oven

DATE INSTALLED 12/83

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with applicable emission limitations, employing less than 10 gallons of coating per day, Wash Primer Catalytic Reducer usage not to exceed 4,000 gallon per year for the entire facility, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Calcium Carbonate

8315.wpd

NEW SC

PTI Num

FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal parts for folding machines. CITY/TWP Sidney

SIC CODE 3554 SCC CODE 4-02-001-10 EMISSIONS UNIT ID K006

EMISSIONS UNIT DESCRIPTION Paint Booth #6 - metal and non-metal parts coating without drying oven

DATE INSTALLED 12/83

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6	62.4 lbs/day; 8.0 lbs/hr and 40 lbs/day for non-metal coating	11.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with applicable emission limitations, employing less than 10 gallons of coating per day, Wash Primer Catalytic Reducer usage not to exceed 4,000 gallon per year for the entire facility, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Calcium Carbonate

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	0510368**c**.wpd	☐	
Modeling form/results	☒	0510368**s**.wpd	☐	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☐
BAT Study	☐	0000000**b.**wpd	☐	☐
Other/misc.	☐	0000000**t**.wpd	☐	☐

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

On June 14, 1999, the Baumfolder Corporation (the permittee) submitted a PTI application for 6 coating booths. The operations at this facility include the final finishing and assembling of paper folding machines. This application is for 6 coating booths. Three of the coating booths were originally installed in 1969, but were modified 12/83, and 3 of the booths were installed 12/83. The 3 older booths are conveyorized and employ a drying oven (max temp is 200 deg F). The newer booths are manually operated without a drying oven. This facility was operated by a variety of owners, until purchased by Heidelberg Finishing in July 1998.

The majority of coating is for miscellaneous metal parts. The applicable rule is OAC rule 3745-21-09(U)(1)(d) which requires a coating VOC content not to exceed 3.5 lbs/gal, excluding water and exempt solvents, as applied. However, pursuant to OAC rule 3745-21-09(U)(2)(e)(iii) an operator is exempt from VOC content requirements if each booth employs less than 10 gallons of coating per day (Shelby Co.). The permittee will maintain compliance through the exemption.

The permittee coats very few non-metal units. Most of the non-metal coating is performed on units which have both metal and non-metal parts. The applicable rule for the non-metal coating is OAC rule 3745-21-07(G)(2). However, when coating a part with metal and non-metal parts, compliance must be demonstrated for both rules (see May 3, 1995, IOC from Bill Juris to Jim Orlemann). To avoid excessive record keeping requirements, the permittee will demonstrate compliance with both rules when coating non-metal parts. Therefore, the permittee will comply with the 10 gallons of coating per day and the 8 lbs VOC per hour (average) and 40 lbs VOC per day when coating parts with non-metal or both metal and non-metal.

Based upon potential-to-emit for the 6 coating booths combined, with the SIP limit of 10 gallons of coating per day, the

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

individual HAP emissions for MEK exceeds 10 TPY and the combined HAPs emissions exceed 25 TPY. The PTE for individual and combined HAPs exceeds the major source thresholds when employing Industrial Wash Primer which is thinned with Wash Primer Catalyst Reducer, Product Number R7K44. By effectively reducing the facility-wide usage of the Reducer, the facility-wide PTE for individual HAP and combined HAPs are below major source threshold. The PTE for any individual HAP is less than 8.0 TPY and combined HAPs is less than 15.0 TPY.

The annual VOC emission limitation is based on worst case coating with proposed cleanup usage. Cleanup is recovered and reused. The company records indicate that 95% of cleanup is recovered; therefore, cleanup emissions are based upon 5% solvent loss.

It is important to note that parts are cleaned prior to coating with an aqueous-based cleaning material, 900 from Sun Industrial Chemical, which contains no organic material and results in no emissions.

To maintain consistency for the entire facility, all annual emission limits and the Reducer usage limitation are based on a rolling, 12-month summation. In addition, all reporting requirements are quarterly excursion with the exception of deviation reporting for the coating per day limitation (i.e., 10 gal/day).

PTE Fee: Each process weight rate is less than 1,000 lbs/hr, the fee is $200 per booth. Although the units were installed/modified prior to applying for a PTI, the fee is not double. The reason the fee is not doubled is that the units were installed prior to July 1993.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

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

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

The Baumfolder Corporation (permittee) has applied for a PTI for 6 coating booths. Each coating booth is used to apply primer and paint to paper folding machines. The majority of the paper folding machines are metal. However, the permittee requested the flexibility to coat both metal and non-metal parts, including parts containing both metal and non-metal.

When coating metal parts, the permittee will comply with the SIP limitation by employing less than 10 gallons of coating per day. When coating non-metal parts or parts with both metal and non-metal, the permittee will comply with the SIP limitations by employing less than 10 gallons of coating per day and limiting hourly and daily VOC emissions to 8 pounds and 40 pounds, respectively, including photochemically reactive cleanup materials.

Three of the coating booths are conveyorized and employ a drying oven (not exceeding 200 deg F), and the other 3 booths are manually operated and do not employ a drying oven.

B. Facility Emissions and Attainment Status

The Baumfolder Corporation (permittee) finishes and assembles paper folding machines. The permittee is located

NEW SOURCE REVIEW FORM B

PTI Number: 05-10368 Facility ID: 0575010020

FACILITY NAME Baumfolder Corp.

FACILITY DESCRIPTION 6 Paint Booths for the coating of metal CITY/TWP Sidney

Emissions Unit ID: **K006**

at 1660 Campbell Road, Sidney, Shelby County. The permittee has applied for a Synthetic Minor PTI for 6 coating booths. The location of the proposed facility is attainment for all criteria pollutants.

The coating booths are currently the only air contaminant sources at this facility. The combined potential-to-emit (PTE) for the 6 coating booths is 69.6 tons VOC per year, 18 tons for an individual HAP (MEK) per year (all other individual HAPs are below 10 TPY), and 29.2 tons per year of combined HAPs. The actual emissions for the 6 booths combined are well below the PTE figures.

C. Source Emissions

Based upon the 10 gallons of coating per day limitation, each of the coating booths has a PTE of VOC of 11..6 TPY, 3.0 TPY individual HAP, 4.87 TPY combined HAPs. The combined PTE for the 6 coating booths is therefore 69.6 TPY VOC, 18.0 TPY for an individual HAP and 29.2 TPY for combined HAPs. By limiting usage of one solvent, the Wash Primer Catalytic Reducer (Product Number R7K44), for the entire facility, the facility-wide PTE for an individual HAP is less than 8.0 TPY and for combined HAPs is less than 15.0 TPY. Consequently, the emissions from each individual booth will be less than the aforementioned figures.

The Wash Primer Catalytic Reducer is used both as a thinner and a cleanup material.

D. Conclusion

The Synthetic Minor PTI will effectively restrict the facility-wide Wash Primer Catalytic Reducer usage as a rolling, 12-month summation. In addition, the PTI will limit individual HAP emissions below 10.0 TPY and combined HAPs emissions below 25.0 TPY as rolling, 12-month summations.

A combination of the usage limitation and monthly record keeping requirements with quarterly deviation reporting requirements shall ensure that compliance with the permit is achieved.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	69.6