

A. Source Description

Elite Enclosure Company submitted their application for 2 paint booths with the assistance of the Small Business Assistance Program. The paint booths are part of a metal fabrication operation.

B. Facility Emissions and Attainment Status

The facility is located in an attainment area and is not a Title V facility. As such, the facility is not a PSD major status facility. The emissions at the facility include particulate from grinding operations, NOx and CO from combustion operations, and VOC and particulate from the coating operations. The emissions units in this permit are coating sources.

C. Source Emissions

The coating sources described in this permit possess hazardous air pollutants (HAP). The company determined that their potential to emit for a single HAP exceeded Title V emission thresholds. So, to limit the HAPs below Title V trigger thresholds the facility has committed to restrict the potential to emit HAPs to 9.9 TPY of any individual HAP and 24.9 TPY of combined HAPs on a rolling twelve month basis. In order to demonstrate compliance, the facility will perform monthly recordkeeping and calculations.

D. Conclusion

The sources have all necessary restrictions placed upon them to limit the potential to emit in order to avoid Title V HAPs triggers. Ohio EPA staff recommends that this permit be issued.



State of Ohio Environmental Protection Agency

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

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 05-12755

DATE: 6/26/2003

Elite Enclosure Company
Rebecca Kubichek
220 Tower Drive
Fort Loramie, OH 45845

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

SWDO

IN

SHELBY COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL **05-12755**

On 6/26/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of an administrative modification of a prior Permit To Install document for an air contaminant source for **Elite Enclosure Company**, located at **220 Tower Drive, Fort Loramie, Ohio**.

The administrative modification shall become effective upon final issuance.

2 miscellaneous metal parts coating lines using less than 10 gallons of coating per day.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 05-12755

Application Number: 05-12755
APS Premise Number: 0575010235
Permit Fee: **To be entered upon final issuance**
Name of Facility: Elite Enclosure Company
Person to Contact: Rebecca Kubichek
Address: 220 Tower Drive
Fort Loramie, OH 45845

Location of proposed air contaminant source(s) [emissions unit(s)]:
**220 Tower Drive
Fort Loramie, Ohio**

Description of proposed emissions unit(s):
2 miscellaneous metal parts coating lines using less than 10 gallons of coating per day.

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

Elite Enclosure Company

Facility ID: 0575010235

PTI Application: 05-12755

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

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5. Severability Clause

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

6. General Requirements

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

7. Fees

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

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8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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

Elite Enclosure Company

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Termination of Permit To Install

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

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5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate Matter	4.82
Volatile Organic Compounds	27.92
Individual HAP	9.9
Total HAPs	24.9

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Elite F
PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>OAC rule 3745-21-09(U)(1)</u>
K001 - Miscellaneous metal parts coating line using less than 10 gallons of coating per day	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B)

OAC rule 3745-17-11(B)

OAC rule 3745-17-07(A)

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Emissions Unit ID: K001

Applicable Emissions
Limitations/Control
Measures

65.7 lbs of volatile organic
compounds (VOC)/day,
including cleanup

13.96 tons VOC/yr,
including
cleanup

0.551 lb particulate
emissions (PE)/hr

2.41 ton PE/yr

Visible PE shall not exceed
0% opacity.

The requirements of this rule
also include compliance with
the requirements of OAC
rule 3745-21-09 (U)(1) and
OAC rule 3745-35-07(B).

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

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

See section A.I.2.a.

See section A.I.2.b.

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

- 2.a** OAC rule 3745-21-09(U)(1) does not apply because the permittee has committed to limit this emissions unit to 10 gallons per day as specified in OAC rule 3745-21-09(U)(2)(e)(iii). If at any time this unit uses more than 10 gallons of coating per day then OAC rule 3745-21-09(U)(1) will be applicable to this unit. To demonstrate that not more than 10 gallons is used in this unit, the permittee shall maintain the record keeping requirements in section A.III.1.
- 2.b** The actual usage 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 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. 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, as applied.
 - b. The number of gallons of each coating employed.
 - c. The total coatings usage, in gallons, from all the coatings [summation of b for all coatings].
 - d. the OC content of each ink and cleanup material employed;
 - e. the total OC emission rate for all inks and cleanup materials, in pounds per day; and
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for the facility:

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Elite F

PTI A

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Emissions Unit ID: K001

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- a. the name and identification number of each coating material employed;
- b. the individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material* in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined HAP content of each coating material in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. the number of gallons of each coating material* employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coating material and cleanup material employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. the total combined HAP usage from all coating material and cleanup material employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
- k. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all

HAP(s) used evaporate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day;
 - b. an identification of each month during which the individual HAP emissions at the facility exceeded 9.9 tons per year, based on a 12-month rolling average; and
 - c. an identification of each month during which the combined HAP emissions at the facility exceeded 24.9 tons per year, based on a 12-month rolling average.
4. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitation in Section A. I. 1. of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation: no more than 10 gallons of coatings per day

Applicable Compliance Method-

Compliance with the gallon usage restriction above shall be based on the record keeping requirements specified in Section A.III.1 of this permit.
 - b. Emission Limitations: 55.1 lbs VOC/day, 10.06 tons VOC/yr

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Elite F

PTI A

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Emissions Unit ID: K001

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation may be determined as follows:

- i. multiply the maximum coatings usage rate (gallons/day) by the maximum VOC content(pounds/gallon) of all the coatings employed;
- ii. multiply the maximum cleanup materials usage rate (gallons/day) by the maximum VOC content (pounds/gallon) of all the cleanup materials employed; and
- iii. add 1.c.i + 1.c.ii.

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the daily VOC limitation is maintained [the annual allowable VOC emission limitation of 13.96 tons represents a value that is greater than the emissions unit's potential to emit of 12 tons/year (the emissions unit's potential to emit was calculated by multiplying the daily allowable emission limitation of 65.7 lbs by 365, and then dividing by 2000)].

- c. Emission Limitation: Visible PE shall not exceed 0% opacity.

Applicable Compliance Method-

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- d. Emission Limitations: 0.551 lbs PE/hour, 2.41 TPY PE

Applicable Compliance Method:

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

$$E = \text{MCSUR} \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

$$E = \text{PE rate (lbs/hr)} = 0.551 \text{ lbs PE/hour}$$

MCSUR = the maximum coatings solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

Compliance with the annual allowable PE limitation shall be assumed as long as compliance with the hourly allowable PE limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000).

- e. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.
- f. Compliance with the HAP emissions limitation in term A.I.2.b shall be determined by the record keeping in term C.3.

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: K001

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Miscellaneous metal parts coating line using less than 10 gallons of coating per day	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

2. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.365 (0.55 g/s)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 209.1

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MAGLC (ug/m3): 4,476

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 still 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.

2. 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.

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Elite F
PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K002 - Miscellaneous metal parts coating line using less than 10 gallons of coating per day	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)
	OAC rule 3745-17-11(B)	OAC rule 3745-35-07(B)
	OAC rule 3745-17-07(A)	

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Emissions Unit ID: K002

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Applicable Emissions
Limitations/Control
Measures

See section A.I.2.b.

65.7 lbs of volatile organic compounds (VOC)/day, including cleanup

13.96 tons VOC/yr, including cleanup

0.551 lb particulate emissions (PE)/hr

2.41 ton PE/yr

Visible PE shall not exceed 0% opacity.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U)(1) and OAC rule 3745-35-07(B).

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

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

See section A.I.2.a.

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

- 2.a** OAC rule 3745-21-09(U)(1) does not apply because the permittee has committed to limit this emissions unit to 10 gallons per day as specified in OAC rule 3745-21-09(U)(2)(e)(iii). If at any time this unit uses more than 10 gallons of coating per day then OAC rule 3745-21-09(U)(1) will be applicable to this unit. To demonstrate that not more than 10 gallons is used in this unit, the permittee shall maintain the record keeping requirements in section A.III.1.
- 2.b** The actual usage 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 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. 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, as applied.
 - b. The number of gallons of each coating employed.
 - c. The total coatings usage, in gallons, from all the coatings [summation of b for all coatings].
 - d. the OC content of each ink and cleanup material employed;
 - e. the total OC emission rate for all inks and cleanup materials, in pounds per day; and
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for the facility:

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- a. the name and identification number of each coating material employed;
- b. the individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material* in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined HAP content of each coating material in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. the number of gallons of each coating material* employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coating material and cleanup material employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. the total combined HAP usage from all coating material and cleanup material employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
- k. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all

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HAP(s) used evaporate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day;
 - b. an identification of each month during which the individual HAP emissions at the facility exceeded 9.9 tons per year, based on a 12-month rolling average; and
 - c. an identification of each month during which the combined HAP emissions at the facility exceeded 24.9 tons per year, based on a 12-month rolling average.
4. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitation in Section A. I. 1. of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation: no more than 10 gallons of coatings per day

Applicable Compliance Method-

Compliance with the gallon usage restriction above shall be based on the record keeping requirements specified in Section A.III.1 of this permit.

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- b. Emission Limitations: 55.1 lbs VOC/day, 10.06 tons VOC/yr

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Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation may be determined as follows:

- i. multiply the maximum coatings usage rate (gallons/day) by the maximum VOC content (pounds/gallon) of all the coatings employed;
- ii. multiply the maximum cleanup materials usage rate (gallons/day) by the maximum VOC content (pounds/gallon) of all the cleanup materials employed; and
- iii. add 1.c.i + 1.c.ii.

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the daily VOC limitation is maintained [the annual allowable VOC emission limitation of 13.96 tons represents a value that is greater than the emissions unit's potential to emit of 12 tons/year (the emissions unit's potential to emit was calculated by multiplying the daily allowable emission limitation of 65.7 lbs by 365, and then dividing by 2000)].

- c. Emission Limitation: Visible PE shall not exceed 0% opacity.

Applicable Compliance Method-

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- d. Emission Limitations: 0.551 lbs PE/hour, 2.41 TPY PE

Applicable Compliance Method:

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

$$E = \text{MCSUR} \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

$$E = \text{PE rate (lbs/hr)} = 0.551 \text{ lbs PE/hour}$$

MCSUR = the maximum coatings solids usage rate (lbs/hr)

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TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

Compliance with the annual allowable PE limitation shall be assumed as long as compliance with the hourly allowable PE limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000).

- e. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.
- f. Compliance with the HAP emissions limitation in term A.I.2.b shall be determined by the record keeping in term C.3.

VI. Miscellaneous Requirements

None

Elite F
PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Miscellaneous metal parts coating line using less than 10 gallons of coating per day	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

- 1. The permit to install for this emissions unit (XXXX1) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.365 (0.55 g/s)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 209.1

MAGLC (ug/m3): 4,476

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 still 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.

2. 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.

III. Monitoring and/or Recordkeeping Requirements

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None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None