



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-3145

DATE: September 29, 1999

Treemen Industries Inc.
George M Ogletree
PO Box 3777
Boardman, OH 44513

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

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

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
DAPC, NEDO
Mahoning Trumbull APC



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: September 29, 1999

FINAL PERMIT TO INSTALL 02-3145

Application Number: 02-3145
APS Premise Number: 0250000982
Permit Fee: **\$1600**
Name of Facility: Treemen Industries Inc.
Person to Contact: George M Ogletree
Address: PO Box 3777
Boardman, OH 44513

Location of proposed air contaminant source(s) [emissions unit(s)]:
619 McClurg Road
Boardman, Ohio

Description of proposed emissions unit(s):
THREE PAINT SPRAY BOOTHS FOR COATING PLASTIC PARTS AND ONE CURING OVEN.

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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Environmental Protection Agency if the proposed sources 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

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	72.8

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth #1 coating operation for non-metal parts	OAC rule 3745-31-05 (A)(3)	Organic compound (OC) emissions shall not exceed 5 pounds per hour (see 2.a and b) and 15.6 TPY.
	OAC rule 3745-21-07 (G)(2)	Organic compound emissions from cleanup shall be limited to 7.9 TPY See B.1. Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (see 2.c).

2. Additional Terms and Conditions

- 2.a When coating non-metal parts and using non-photochemically reactive materials [as defined in OAC rule 3745-21-01 (C)(5)], the OC emissions shall not exceed 5 pounds of OC per hour.
- 2.b This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed as a coating.
- 2.c When coating non-metal parts and using photochemically reactive materials [as defined in OAC rule 3745-21-01 (C)(5)], the OC emissions shall not exceed 8 pounds per hour and 40 pounds per day of OC.

B. Operational Restrictions

1. The permittee shall not use any photochemically reactive material(s) for cleanup.
2. The permittee shall not use more than 2400 gallons per year of cleanup materials.
3. The maximum annual operating hours for this emissions unit shall not exceed 6240.

C. Monitoring and/or Recordkeeping Requirements

1. For each day on which a photochemically reactive material (coating) is employed for the coating of non-metal parts, the permittee shall collect and record the following information for the coating of non-metal parts:
 - a. The company identification for each coating employed.
 - b. The total number of gallons of each coating employed.
 - c. The OC content of each coating employed.
 - d. The total number of hours the emissions unit was in operation.
 - e. The total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day.
 - f. The total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C.3 of this permit), in pounds per day.
 - g. The average hourly OC emissions rate for all coatings [i.e., (f)/(d), 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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. For each day on which exclusively non-photochemically reactive material (coating and/or cleanup material) is employed for the coating of non-metal parts, the permittee shall collect and record the following information for the coating of non-metal parts:
 - a. The company identification for each coating.

- b. The total number of gallons of each coating.
- c. The OC content of each coating, in pounds per gallon.
- d. The total number of hours the emissions unit was in operation.
- e. The total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day.
- f. The total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C.3 of this permit), in pounds per day.
- g. The average hourly OC emissions rate for all coatings[i.e., (f)/(d), 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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P001), the permittee shall utilize a value of 85% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 15% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon information provided by the permittee.
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain monthly records of cleanup solvent usage and emissions from the cleanup materials.

6. The permittee shall maintain monthly records of the operating hours for this emissions unit.

D. Reporting Requirements

1. In accordance with paragraph 2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. For the days during which exclusively non-photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the non-photochemically reactive coatings exceeded 5 pounds per hour, and the actual average hourly OC emissions for each such day.
2. In accordance with paragraph 2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which include and identification of each day during which a photochemically reactive material is used for cleanup.
4. The permittee shall submit annual emissions reports for the coating and the cleanup operations. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit annual reports which identify any exceedances of the annual operating hourly limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

- a. Emission Limitation:
5 pounds per hour of OC
 - b. Applicable Compliance Method:
Compliance shall be based upon the recordkeeping specified in Section C.1.
2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
8 pounds per hour of OC

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping specified in Section C.2.

- b. Emission Limitation:

40 pounds per day of OC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.2.
3.
 - a. Emissions Limitation:

15.6 tons per year of OC from coating operation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.1 and C.2.
4.
 - a. Emissions Limitation:

7.9 tons per year of OC from cleanup material

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.5.
5. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied as though all permitted VOC emissions were the pollutant with the most restrictive MAGLC and using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The

following summarizes the results of this modeling:

Pollutant: Acetone

TLV (ug/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 7.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 886.1

MAGLC (ug/m3): 28,300

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): (total for R001-R003): 2658.3

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth #2 coating operation for non-metal parts	OAC rule 3745-31-05 (A)(3)	Organic compound (OC) emissions shall not exceed 5 pounds per hour (see 2.a and b) and 15.6 TPY.
	OAC rule 3745-21-07 (G)(2)	Organic compound emissions from cleanup shall be limited to 7.9 TPY. See B.1. Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (see 2.c).

2. Additional Terms and Conditions

- 2.a When coating non-metal parts and using non-photochemically reactive materials [as defined in OAC rule 3745-21-01 (C)(5)], the OC emissions shall not exceed 5 pounds of OC per hour.
- 2.b This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed as a coating.
- 2.c When coating non-metal parts and using photochemically reactive materials [as defined in OAC rule 3745-21-01 (C)(5)], the OC emissions shall not exceed 8 pounds per hour and 40 pounds per day of OC.

B. Operational Restrictions

1. The permittee shall not use any photochemically reactive material(s) for cleanup.
2. The permittee shall not use more than 2400 gallons per year of cleanup materials.
3. The maximum annual operating hours for this emissions unit shall not exceed 6240.

C. Monitoring and/or Recordkeeping Requirements

1. For each day on which a photochemically reactive material (coating) is employed for the coating of non-metal parts, the permittee shall collect and record the following information for the coating of non-metal parts:
 - a. The company identification for each coating employed.
 - b. The total number of gallons of each coating employed.
 - c. The OC content of each coating employed.
 - d. The total number of hours the emissions unit was in operation
 - e. The total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day.
 - f. The total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C.3 of this permit), in pounds per day.
 - g. The average hourly OC emissions rate for all coatings [i.e., (f)/(d), 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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. For each day on which exclusively non-photochemically reactive material (coating and/or cleanup material) is employed for the coating of non-metal parts, the permittee shall collect and record the following information for the coating of non-metal parts:
 - a. The company identification for each coating.

- b. The total number of gallons of each coating.
- c. The OC content of each coating, in pounds per gallon.
- d. The total number of hours the emissions unit was in operation.
- e. The total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day.
- f. The total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C.3 of this permit), in pounds per day.
- g. The average hourly OC emissions rate for all coatings [i.e., (f)/(d), 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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P001), the permittee shall utilize a value of 85% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 15% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon information provided by the permittee.
- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- 5. The permittee shall maintain monthly records of cleanup solvent usage and emissions from the cleanup materials.

6. The permittee shall maintain monthly records of the operating hours for this emissions unit.

D. Reporting Requirements

1. In accordance with paragraph 2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. For the days during which exclusively non-photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the non-photochemically reactive coatings exceeded 5 pounds per hour, and the actual average hourly OC emissions for each such day.
2. In accordance with paragraph 2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which include an identification of each day during which a photochemically reactive material is used for cleanup.
4. The permittee shall submit annual emissions reports for the coating and the cleanup operations. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit annual reports which identify any exceedances of the annual operating hourly limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

- a. Emission Limitation:
5 pounds per hour of OC
Applicable Compliance Method:
Compliance shall be based upon the recordkeeping specified in Section C.1.
2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8 pounds per hour of OC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.2.

b. Emission Limitation:

40 pounds per day of OC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.2.

3. a. Emissions Limitation:

15.6 tons per year of OC from coating operation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.1 and C.2.

4. a. Emissions Limitation:

7.9 tons per year of OC from cleanup material

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.5.

5. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the

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design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied as though all permitted VOC emissions were the pollutant with the most restrictive MAGLC and using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of this modeling:

Pollutant: AcetoneTLV (ug/m³): 1188

Maximum Hourly Emission Rate (lbs/hr): 7.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 886.1MAGLC (ug/m³): 28,300Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): (total for R001-R003): 2658.3

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth #3 coating operation for non-metal parts.	OAC rule 3745-31-05 (A)(3)	Organic compound (OC) emissions shall not exceed 5 pounds per hour (see 2.a and b) and 15.6 TPY.
	OAC rule 3745-21-07 (G)(2)	Organic compound emissions from cleanup shall be limited to 7.9 TPY. See B.1. Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (see 2.c).

2. Additional Terms and Conditions

- 2.a When coating non-metal parts and using non-photochemically reactive materials [as defined in OAC rule 3745-21-01 (C)(5)], the OC emissions shall not exceed 5 pounds of OC per hour.
- 2.b This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed as a coating.
- 2.c When coating non-metal parts and using photochemically reactive materials [as defined in OAC rule 3745-21-01 (C)(5)], the OC emissions shall not exceed 8 pounds per hour and 40 pounds per day of OC.

B. Operational Restrictions

1. The permittee shall not use any photochemically reactive material(s) for cleanup.
2. The permittee shall not use more than 2400 gallons per year of cleanup materials.
3. The maximum annual operating hours for this emissions unit shall not exceed 6240.

C. Monitoring and/or Recordkeeping Requirements

1. For each day on which a photochemically reactive material (coating) is employed for the coating of non-metal parts, the permittee shall collect and record the following information for the coating of non-metal parts:
 - a. The company identification for each coating employed.
 - b. The total number of gallons of each coating employed.
 - c. The OC content of each coating employed.
 - d. The total number of hours the emissions unit was in operation
 - e. The total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day.
 - f. The total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C.3 of this permit), in pounds per day.
 - g. The average hourly OC emissions rate for all coatings[i.e., (f)/(d), 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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. For each day on which exclusively non-photochemically reactive material (coating and/or cleanup material) is employed for the coating of non-metal parts, the permittee shall collect and record the following information for the coating of non-metal parts:

- a. The company identification for each coating and cleanup material employed.
- b. The total number of gallons of each coating and cleanup material employed.
- c. The OC content of each coating and cleanup material, in pounds per gallon.
- d. The total number of hours the emissions unit was in operation.
- e. The total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day.
- f. The total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C.3 of this permit), in pounds per day.
- g. The average hourly OC emissions rate for all coatings[i.e., (f)/(d), 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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P001), the permittee shall utilize a value of 85% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 15% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon information provided by the permittee.
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

5. The permittee shall maintain monthly records of cleanup solvent usage and emissions from the cleanup materials.
6. The permittee shall maintain monthly records of the operating hours for this emissions unit.

D. Reporting Requirements

1. In accordance with paragraph 2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. For the days during which exclusively non-photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the non-photochemically reactive coatings exceeded 5 pounds per hour, and the actual average hourly OC emissions for each such day.
2. In accordance with paragraph 2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which include an identification of each day during which a photochemically reactive material is used for cleanup.
4. The permittee shall submit annual emissions reports for the coating and the cleanup operations. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit annual reports which identify any exceedances of the annual operating hourly limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

5 pounds per hour of OC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.1.

2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 pounds per hour of OC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.2.

b. Emission Limitation:

40 pounds per day of OC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.2.

3. a. Emissions Limitation:

15.6 tons per year of OC from coating operation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.1 and C.2.

4. a. Emissions Limitation:

7.9 tons per year of OC from cleanup material

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C.5.

5. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the

design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied as though all permitted VOC emissions were the pollutant with the most restrictive MAGLC and using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of this modeling:

Treemen Industries Inc.
PTI Application: **02 2145**
Septer

Facility ID: **0250000982**

Emissions Unit ID: **R003**

Pollutant: Acetone

TLV (ug/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 7.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 886.1

MAGLC (ug/m3): 28,300

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): (total for R001-R003): 2658.3

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flash off/curing oven	OAC rule 3745-21-07(G)(1) OAC rule 3745-31-05 (A)(3)	Organic compound (OC) emissions shall not exceed 3 pounds per hour and 15 pounds per day.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booths (R001-R003), the permittee shall utilize a value of 85% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 15% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon information provided by the permittee.
2. The permittee shall collect and record the following information for each day for the

oven:

- a. the total potential (prior to applying the booth/oven "split") uncontrolled hourly organic emission rate for all coatings employed in the coating operation associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1 of this permit), in pounds per hour for each hour of the day; and
- b. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all coatings employed in the coating operation associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1 of this permit), in pounds per day.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each hour during which the OC emissions exceeded 3 pounds per hour, and the actual OC emissions for each such hour; and
 - b. an identification of each day during which the OC emissions exceeded 15 pounds per day, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

3 pounds per hour of OCs

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

b. Emission Limitation:

15 pounds per day of organic compounds

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

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Treem

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September 29, 1999

Emissions Unit ID: **P001**

F. Miscellaneous Requirements

None.