

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

Permit To Install **06-07294**

A. Source Description

25 gallon capacity solvent reclaimer which will be used to clean paint booth cleanup solvent for reuse. The BAT limit of 25.2 lb/day (based on one batch per day, taking 5-6 hours to process) is more stringent than OAC 3745-21-07 (G)(2).

B. Facility Emissions and Attainment Status

Facility emissions are solely from the coating operation (R001) and associated cleanup activities. A draft administrative modification has been issued (06-04114) on 8/7/03 as a synthetic minor, limiting VOC emissions to 7.5 TPY from coating, an additional 7.5 TPY from cleanup and a rolling 12-month facility-wide HAP limit of 8.0 TPY. Tuscarawas County is attainment for all pollutants.

C. Source Emissions

Potential emissions of VOC from P001 are 25.2 lb/hr and 4.6 TPY. These emissions are included in the spray booth (R001) cleanup emissions and therefore will not increase facility-wide permitted emissions. The facility will continue to comply with the facility-wide HAP limit of 8.0 tons per 12-month period.

D. Conclusion

The federally enforceable limitation on HAP emissions will be sufficient to assure that Title V thresholds are not exceeded.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
TUSCARAWAS COUNTY
Application No: 06-07294**

CERTIFIED MAIL

DATE: 9/4/2003

Sugarcreek Industries
Joanna Wenker
P.O. Box 460 425 South Broadway
Sugarcreek, OH 44681

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 **\$400** 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

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

CC: USEPA

SEDO

WV

PA

TUSCARAWAS COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07294 FOR AN AIR CONTAMINANT SOURCE FOR SUGARCREEK INDUSTRIES

On 9/4/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sugarcreek Industries**, located at **425 South Broadway, Sugarcreek, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07294:

Solvent Reclaimer.

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

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**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 06-07294

Application Number: 06-07294
APS Premise Number: 0679000200
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sugarcreek Industries
Person to Contact: Joanna Wenker
Address: P.O. Box 460 425 South Broadway
Sugarcreek, OH 44681

Location of proposed air contaminant source(s) [emissions unit(s)]:

**425 South Broadway
Sugarcreek, Ohio**

Description of proposed emissions unit(s):

Solvent Reclaimer.

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

Sugarcreek Industries

PTI Application: 06-07294

Issued: To be entered upon final issuance

Facility ID: 0679000200

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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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

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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.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

- 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

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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.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.6

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>
P001 - Solvent reclaimer	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 25.2 pounds per day, 4.6 tons per year. See section A.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B)	Total hazardous air pollutant (HAP) emissions from the facility shall not exceed 8.0 tons per 12-month rolling period. See B.1. and B.2.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a This emissions unit only processes used cleanup solvent associated with the coating operations at the facility (R001). The permit for R001 limits the amount of cleanup material employed to 2000 gallons per 12-month rolling period and includes the definition: "the number of gallons of cleanup material employed is the difference between the gallons

Emissions Unit ID: **P001**

of cleanup material received and the gallons of cleanup material shipped off site." Therefore, all emissions from the solvent reclaimer will be included in the cleanup emissions in R001. R001 contains a synthetic minor limit to avoid Title V. Those same requirements are included in this permit also.

B. Operational Restrictions

1. The permittee shall not employ more than 2000 gallons per 12-month rolling period for cleanup.

NOTE: The number of gallons of cleanup material employed is the difference between the gallons of cleanup material received and the gallons of cleanup material shipped off site.

2. The permittee shall not process more than one batch per day through the reclaimer.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the cleanup activities at the facility:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the total HAP content of each cleanup material, in pounds per gallon;
 - d. the total emissions of HAP from all cleanup materials employed [the sum of (b. times c.) for all cleanup materials], in pounds or tons.
2. The permittee shall collect and record the following information each month:
 - a. the total emissions of HAP from the facility in the previous 12 months, in tons; and
 - b. the total number of gallons of cleanup material employed in the previous 12 months.
3. For each day during which the permittee processes more than one batch per day through the reclaimer, the permittee shall maintain a record of the number of batches processed during that day.

D. Reporting Requirements

1. The permittee shall submit quarterly reports which include the following information:

**Suga
PTI**

Emissions Unit ID: **P001**

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- a. the total emissions of HAP from the facility, in tons, during each calendar month and each rolling, 12-month period; and
- b. the total number of gallons of cleanup material employed during each calendar month and each rolling, 12-month period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include information for each month during the previous calendar quarter.

2. The permittee shall submit deviation (excursion) reports that identify each day when more than one batch of solvent was processed through the reclaimer. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 25.2 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the following calculation based on testing performed by the facility at maximum reclaimer capacity.

$$(3.5 \text{ gal. solvent/batch})(7.2 \text{ lb/gal. solvent})(1 \text{ batch/day}) = 25.2 \text{ lb/day}$$

- b. Emission Limitation:

VOC emissions from coating operations shall not exceed 4.6 tons per year.

Applicable Compliance Method:

Compliance with the 4.6 tons VOC per year limit shall be based on the maximum daily emission rate of the reclaimer while operating every day of the year as shown in the following equation.

Suga**PTI**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

$$(25.2 \text{ lb/day})(365 \text{ day/yr})(0.0005 \text{ ton/lb}) = 4.6 \text{ TPY}$$

c. Emission Limitation:

Total HAP emissions from the facility shall not exceed 8.0 tons per 12-month rolling period. The permittee shall not employ more than 2000 gallons per 12-month rolling period for cleanup. The permittee shall not process more than one batch per day through the reclaimer.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C and the reporting requirements specified in Section D.

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2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), all the terms and conditions of this permit are federally enforceable. The applicant has requested the restrictions in this permit to limit the potential to emit and, therefore, avoid Title V applicability.