

Synthetic Minor Determination and/or Netting Determination

Permit To Install **06-07553**

A. Source Description

R001 is a conveyORIZED coating line consisting of a water-based cleaning line, two electrostatic coating chambers and a curing oven. Associated cleanup activities are also included in the emissions estimates.

B. Facility Emissions and Attainment Status

This is the only emissions unit at the facility except for a solvent reclaimer whose emissions are included in the allowable cleanup emissions from R001.

C. Source Emissions

Maximum emissions from coating are defined by using the equipment capacity of 7.5 gallons per hour of coatings with 3.0 lb VOC/gal, in accordance with OAC 3745-21-09(U)(1)(i), or 22.5 lb/hr. Cleanup operations contribute another 1200 gal/yr of 81% xylene/19% ethyl benzene at 7.26 lb VOC/gal and 800 gal/yr of propylene glycol at 8.64 lb VOC/gal, or 7.82 TPY to put the potential VOC emissions over 100 TPY. Coatings will be limited to 21,000 gal/12-month, with appropriate recordkeeping/reporting, to ensure VOC and xylene (HAP) do not exceed Title V thresholds.

D. Conclusion

With federally enforceable restrictions, the facility will be a synthetic minor and avoid Title V applicability.



Street Address:

Mailing Address:

State of Ohio Environmental Protection Agency
Lazarus Gov. Center TEL: (614) 644-3020 FAX: (614) 644-2829

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
TUSCARAWAS COUNTY
Application No: 06-07553**

CERTIFIED MAIL

DATE: 7/27/2004

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 **\$200** 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

SEDO

WV

PA

TUSCARAWAS COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07553 FOR AN AIR CONTAMINANT SOURCE FOR
SUGARCREEK INDUSTRIES**

On 7/27/2004 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 06-07553:

Chapter 31 modification PTI 06 04114 R001.

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 06-07553

Application Number: 06-07553
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):
Chapter 31 modification PTI 06 04114 R001.

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

Facility ID: 0679000200

PTI Application: 06-07553

Issued: To be entered upon final issuance

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 and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

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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 Title V permit modification application within twelve (12) months after commencing

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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).

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- 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	39.4

Sugar
PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
R001 - Two electrostatic paint chambers and curing oven Chapter 31 modification to increase coating and cleanup usage. This PTI supersedes PTI # 06-04114.	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09 (U)(1)(i) OAC rule 3745-35-07(B)	Volatile organic compounds (VOC) emissions from coating operations shall not exceed 22.5 pounds per hour. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i) and OAC rule 3745-35-07(B). VOC content of coatings shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents. VOC emissions from coating operations shall not exceed 31.5 tons in any rolling 12-month period. VOC emissions from cleanup operations shall not exceed 7.9 tons in any rolling 12-month period. Emissions of total hazardous air pollutant (HAP) from the facility shall

not exceed 12.1 tons per 12-month rolling period.

Emissions of any individual HAP from the facility shall not exceed 9.4 tons per 12-month rolling period.
See B.1.

2. Additional Terms and Conditions

2.a None.

B. Operational Restrictions

1. The permittee shall not employ more than 1200 gallons of cleanup solvents which contain HAP in any 12-month rolling period.

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 employ more than 21,000 gallons of coating in any 12-month rolling period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed:
 - a. the name and identification;
 - b. the number of gallons;
 - c. the VOC content, as applied, in pounds per gallon;
 - d. each individual HAP and total HAP content, in pounds per gallon;
 - e. the total VOC emissions from all cleanup materials employed [the sum of (b. times c.), for all cleanup materials], in pounds or tons;
 - f. the total VOC emissions from all coatings employed [the sum of (b. times c.), for all

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PTI A

Emissions Unit ID: **R001**

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- coatings], in pounds or tons;
- g. the monthly emissions of each individual HAP and total HAP [the sum of (b. times d.)], in pounds or tons;
 - h. the updated rolling, 12-month summation for individual HAP emissions, for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
 - i. the updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
 - j. the total number of gallons of coatings employed in the previous 12 months; and
 - k. the total number of gallons of cleanup solvents which contain HAP employed in the previous 12 months.

The permittee has sufficient monthly records of coatings and cleanup materials usage to begin calculating the rolling, 12-month summations upon final issuance of this permit.

2. The permit to install for this emissions unit (R001) 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: xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 4.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 448.4

MAGLC (ug/m3): 10,338

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Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(AAA)(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 (AAA)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of a coating which exceeds the limit of 3.0 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly reports which include the following information:
 - a. the total emissions of VOC from all coatings, in tons, during each calendar month and each rolling, 12-month period;
 - b. the total emissions of VOC from all cleanup materials, in tons, during each calendar month and each rolling, 12-month period;
 - c. the total emissions of each individual and total HAP from the facility, in tons, during each calendar month and each rolling, 12-month period;
 - d. the total number of gallons of coating employed during each calendar month and each rolling, 12-month period; and
 - e. the total number of gallons of cleanup solvents which contain HAP 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.

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:

Volatile organic compounds (VOC) emissions from coating operations shall not exceed 22.5 pounds per hour.

Applicable Compliance Method:

Sugar**PTI A**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

Compliance shall be demonstrated based on the maximum capacity of the spraying equipment (7.5 gallons per hour) while using coatings that comply with the VOC content limitation (3.0 pounds VOC per gallon of coating, excluding water and exempt solvents).

b. Emission Limitation:

VOC content of coatings shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

c. Emission Limitation:

VOC emissions from coating operations shall not exceed 31.5 tons in any rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. This limit was based on the maximum allowable annual production capacity (21,000 gallons per year of coating) while using coatings that comply with the VOC content limitation (3.0 pounds VOC per gallon of coating, excluding water and exempt solvents).

d. Emission Limitation:

VOC emissions from cleanup operations shall not exceed 7.9 tons in any rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials. This limit was based on the permittee's application which showed the following maximum usage rates:

$$(1200 \text{ gal/yr xylene/ethyl benzene})(7.26 \text{ lb/gal}) + (800 \text{ gal/yr propylene glycol})(8.64 \text{ lb/gal}) = 15,624 \text{ lb/yr} = 7.82 \text{ TPY}$$

e. Emission Limitation:

Emissions of total hazardous air pollutant (HAP) from the facility shall not exceed 12.1 tons per 12-month rolling period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. This limit was based on the permittee's application which showed the following maximum usage rates:

$$(1200 \text{ gal/yr xylene/ethyl benzene})(7.26 \text{ lb/gal})(100\% \text{ HAP}) + (21,000 \text{ gal/yr coating})(0.733 \text{ lb HAP/gal}) = 24,105 \text{ lb/yr} = 12.06 \text{ TPY}$$

f. Emission Limitation:

Emissions of any individual HAP from the facility shall not exceed 9.4 tons per 12-month rolling period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. This limit was based on the permittee's application which showed the following maximum usage rates:

$$(1200 \text{ gal/yr xylene/ethyl benzene})(7.26 \text{ lb/gal})(81\% \text{ xylene}) + (21,000 \text{ gal/yr}$$

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Sugar

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **R001**

coating)(0.552 lb xylene/gal) = 18,649 lb/yr = 9.33 TPY

Sugar

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

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.