



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
TUSCARAWAS COUNTY**

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: 06-07117

DATE: 7/1/2003

Kimble Fabricating Co.
Jim Cahill
3211 Brightwood Rd.
Midvale, OH 44653

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 7/1/2003
Effective Date: 7/1/2003**

FINAL PERMIT TO INSTALL 06-07117

Application Number: 06-07117
APS Premise Number: 0679000305
Permit Fee: **\$1200**
Name of Facility: Kimble Fabricating Co.
Person to Contact: Jim Cahill
Address: 3211 Brightwood Rd.
Midvale, OH 44653

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3211 Brightwood Rd.
Midvale, Ohio**

Description of proposed emissions unit(s):
Paint booth and shot blasting booth.

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

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 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

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	11.5
PE	3.0

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>
K001 - Spray booth	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) shall not exceed 14.0 lb/hr. Particulate emissions shall not exceed 2.5 tons per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-09 (U)(1)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-35-07(B)	Emissions of VOC shall not exceed 11.5 tons during any 12-month period.
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any

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stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 5,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1500
1-2	3000
1-3	4000
1-4	5000
1-5	5000
1-6	5000
1-7	5000
1-8	5000
1-9	5000
1-10	5000
1-11	5000
1-12	5000

After the first 12 calendar months of operation, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each metal coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied.
 - c. The daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage for each month.
 - b. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the coating usage figures. Also, during the first 12 calendar months of operation, the permittee shall record the cumulative coating usage for each calendar month.
 - c. Number of gallons of cleanup solvent used.
 - d. VOC emissions from cleanup (gallons of solvent x lb VOC/gallon).

[Note: The coating information must be for the coatings as employed, including any thinning solvents, hardeners, etc. added at the emissions unit.]

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

Pollutant: methyl isobutyl ketone

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TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 3.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 550.2

MAGLC (ug/m³): 4877

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation all exceedances of the maximum allowable cumulative coating usage levels. These reports shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 14.0 lb/hr.

Applicable Compliance Method:

The emission limitations represent the maximum potential of the emissions unit as determined by multiplying the maximum coating VOC content by the maximum usage rate for that coating.

$$(4 \text{ gal/hr})(3.5 \text{ lbs/gal}) = 14.0 \text{ lbs/hr}$$

- b. Emission Limitation:

Emissions of VOC shall not exceed 11.5 tons during any 12-month period.

Applicable Compliance Method:

The emissions limitation were determined by multiplying the maximum coating VOC content by the operational limit of 5000 gallons per year and adding the projected maximum cleanup solvent usage multiplied by the solvent density.

$$[(3.5 \text{ lbs/gal})(5000 \text{ gal/yr}) + (720 \text{ gal/yr})(7.5 \text{ lb/gal})](0.0005 \text{ ton/lb}) = 11.45 \text{ tons/yr}$$

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of this permit.

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Emissions Unit ID: K001

c. Emission Limitation:

The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds VOC per gallon of coating shall be based upon the record keeping specified in Section C.1 of this permit.

d. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

e. Emission Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method: Compliance shall be determined by the following equation:

(max usage rate)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)

Currently: (4 gal/hr)(15.69 lbs/gal)(0.59 solids)(0.50 transfer)(0.02 control) = 0.37 lb/hr

f. Emission Limitation: Particulate emissions shall not exceed 2.5 tons per year.

Applicable Compliance Method: Compliance shall be determined by the summation of the results of the following equation for each coating: (annual usage)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)(0.0005 ton/lb) = TPY

g. Emission Limitation: Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

Applicable Compliance Method: If required, compliance with these emission limits shall be demonstrated in accordance with 40 CFR 60 Appendix A, Method 9.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Shot blast booth vented to a fabric filter which is exhausted inside the building	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)	Particulate emissions (PE) shall not exceed 0.1 lb/hr, 0.5 ton/yr. There shall be no visible emissions from the fabric filter stack. The emission limitation specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations

log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.1 lb/hr, 0.5 ton/yr.

Applicable Compliance Method:

Compliance with the PE limit is based on a conservative emission factor provided by the applicant, based on knowledge of similar processes, in the following calculation:

$(500 \text{ lb/hr shot and dust generated})(99\% \text{ capture eff.})(99.9\% \text{ control eff.}) = 0.005 \text{ lb/hr}$

Annual allowable emissions assume full-time operation at the hourly allowable rate:

$(0.1 \text{ lb/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 0.44 \text{ ton/yr}$

- b. Emission Limitation:

There shall be no visible emissions from the fabric filter stack.

Applicable Compliance Method:

If required, compliance with the emission limitation identified above shall be determined in a manner similar to Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1,

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F. Miscellaneous Requirements

None