

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 06-07645

**A. Source Description**

This is a new coating line at an existing facility which will fabricate and paint cement mixer drums to be mounted on truck chassis.

**B. Facility Emissions and Attainment Status**

Tuscarawas County is attainment for all pollutants. The emissions units in this permit constitute the total facility emissions of VOC and HAP, i.e., 58.4 TPY VOC, 9.9 TPY individual HAP and 18.4 TPY total HAP.

**C. Source Emissions**

The VOC emission rate at maximum capacity is 14.0 lb/hr (61.3 TPY at 8760 hr/yr) for K001 and 10.7 lb/hr (46.9 TPY) for K002. At maximum operation, however, HAP emissions of methyl isobutyl ketone (MIBK) and methyl ethyl ketone (MEK) could each exceed 10 TPY. Coatings will be limited to 26,900 gallons per rolling 12-month period, limiting MIBK emissions to 7.9 TPY and MEK emissions to 8.3 TPY, and avoid Title V HAP thresholds. Toxics modeling was done and showed acceptable impact.

**D. Conclusion**

The federally enforceable production and emissions limits established by this permit are adequate to ensure that Title V thresholds are not exceeded.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
TUSCARAWAS COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No:** 06-07645

**Fac ID:** 0679000305

**DATE:** 12/21/2004

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

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 **\$500** 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.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

SEDO

WV

PA

**TUSCARAWAS COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07645 FOR AN AIR CONTAMINANT SOURCE FOR  
Kimble Fabricating Co.**

On 12/21/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Kimble Fabricating Co.**, located at **3211 Brightwood Rd., Midvale, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07645:

**Paint booth and filters and curing oven and monorail conveyor and electrostatic paint gun.**

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 06-07645**

Application Number: 06-07645  
Facility ID: 0679000305  
Permit Fee: **To be entered upon final issuance**  
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 filters and curing oven and monorail conveyor and electrostatic paint gun.**

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

**Kimble Fabricating Co.**

**Facility ID: 0679000305**

**PTI Application: 06-07645**

**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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**PTI Application: 06-07645**

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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**

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

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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	58.4
Single HAP	9.9
Total HAP	18.4

Kimble Fabricating Co.  
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Facility ID: 0679000305

Emissions Unit ID: K001

**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.

OAC rule 3745-21-09 (U)(1)(d)

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

K001 - Paint booth number 1

OAC rule 3745-31-05(A)(3)

Administrative modification to PTI  
#06-07117, issued 7/1/03

OAC rule 3745-17-11(B)

OAC rule 3745-17-07(A)

OAC rule 3745-35-07(B)

**Kimbl  
PTI A**

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control Measures

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

Particulate emissions shall not exceed 2.5 tons per year.

Total emissions of VOC from K001 and K002, combined, shall not exceed 58.4 tons during any 12-month period.

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).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

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.

Particulate emissions shall not exceed 0.551 pound per hour.

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.

## 2. Additional Terms and Conditions

2.a None

## B. Operational Restrictions

1. The total maximum annual coating usage for emissions units K001 and K002, combined, shall not exceed 26,900 gallons, based upon a rolling, 12-month summation.
2. The total maximum annual usage of cleanup solvent for emissions units K001 and K002, combined, shall not exceed 2120 gallons, based upon a rolling, 12-month summation.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day during which the coating line uses any coating which exceeds 3.5 pounds VOC per gallon:
  - 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 collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001 and K002, combined:
  - a. the name and identification of each coating and cleanup material;
  - b. the number of gallons of coatings;
  - c. the number of gallons of cleanup materials;
  - d. the VOC content, as applied, in pounds per gallon;
  - e. the individual HAP content, for each HAP, in pounds per gallon;
  - f. total HAP content, in pounds per gallon;

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- g. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times d.) for all cleanup materials] divided by 2000, in tons;
- h. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times e.), for each HAP in all coatings plus (c. times e.) for each HAP in all cleanup materials] divided by 2000, in tons;
- i. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.) for all coatings plus (c. times f.) for all cleanup materials] divided by 2000, in tons;
- j. the rolling, 12-month summation of the coating usage figures; and
- k. the rolling, 12-month summation of the cleanup material usage figures.

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

- 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

TLV (mg/m<sup>3</sup>): 204.83

Maximum Hourly Emission Rate (lbs/hr): 3.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 550.2

MAGLC (ug/m<sup>3</sup>): 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

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"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

**Kimble Fabricating Co.**  
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**Issued**

**Facility ID: 0679000305**

Emissions Unit ID: **K001**

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 or cleanup materials. These reports shall be sent to the Southeast District Office within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports which include the following information:
  - a. the total emissions of VOC from emissions units K001 and K002, combined, in tons;
  - b. the total emissions of each individual HAP from emissions units K001 and K002, combined, in tons; and
  - c. the total emissions of all HAP from emissions units K001 and K002, combined, in tons.

These reports shall be submitted by January 31 of each year and shall include information for each 12-month summation recorded during the previous calendar year.

#### **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.

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

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## b. Emission Limitation:

Total emissions of VOC from K001 and K002, combined, shall not exceed 58.4 tons during any 12-month period.

## Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of this permit. Initial compliance was determined by multiplying the maximum coating VOC content by the operational limit of 26,900 gallons per year and adding the projected maximum cleanup solvent usage multiplied by the solvent density.  
 $[(3.5 \text{ lbs/gal})(26,900 \text{ gal/yr}) + (2120 \text{ gal/yr})(7.5 \text{ lb/gal})](0.0005 \text{ ton/lb}) = 55.0 \text{ tons/yr}$

## c. Emission Limitation:

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

## Applicable Compliance Method:

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

## d. 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 Sections C.1 and C.2. of this permit.

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

## f. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

**Kimble Fabricating Co.**  
**PTI Application: 06-07615**  
**Issued**

**Facility ID: 0679000305**

Emissions Unit ID: **K001**

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

g. 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

h. 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.

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**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>	
K002 - Monorail paint system	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(d)
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)	

**Kimbl  
PTI A**

Emissions Unit ID: **K002**

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control Measures

Emissions of volatile organic compounds (VOC) from coating operations shall not exceed 10.75 lb/hr.

Emissions of VOC from cleanup operations shall not exceed 48.0 lb/day.

Total emissions of VOC from K001 and K002, combined, shall not exceed 58.4 tons during any 12-month period.

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).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

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.

Particulate emissions shall not exceed 0.551 pound per hour.

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.

**2. Additional Terms and Conditions****2.a** None**B. Operational Restrictions**

1. The total maximum annual coating usage for emissions units K001 and K002, combined, shall not exceed 26,900 gallons, based upon a rolling, 12-month summation
2. The total maximum annual usage of cleanup solvent for emissions units K001 and K002, combined, shall not exceed 2120 gallons, based upon a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day during which the coating line uses any coating which exceeds 3.5 pounds VOC per gallon:
  - 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; and
  - 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 collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001 and K002, combined:
  - a. the name and identification of each coating and cleanup material;
  - b. the number of gallons of coatings;
  - c. the number of gallons of cleanup materials;
  - d. the VOC content, as applied, in pounds per gallon;
  - e. the individual HAP content, for each HAP, in pounds per gallon;
  - f. total HAP content, in pounds per gallon;

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- g. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times d.) for all cleanup materials] divided by 2000, in tons;
  - h. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times e.), for each HAP in all coatings plus (c. times e.) for each HAP in all cleanup materials] divided by 2000, in tons;
  - i. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.) for all coatings plus (c. times f.) for all cleanup materials] divided by 2000, in tons;
  - j. the rolling, 12-month summation of the coating usage figures; and
  - k. the rolling, 12-month summation of the cleanup material usage figures.
3. The permit to install for this emissions unit (K002) 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 ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 1.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1670

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MAGLC (ug/m3): 14,042

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 or cleanup material usage limitations. These reports shall be sent to the Southeast District Office within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports which include the following information:
  - a. the total emissions of VOC from emissions units K001 and K002, combined, in tons;
  - b. the total emissions of each individual HAP from emissions units K001 and K002, combined, in tons; and
  - c. the total emissions of all HAP from emissions units K001 and K002, combined, in tons.

These reports shall be submitted by January 31 of each year and shall include information for each 12-month summation recorded during the previous calendar year.

**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) from coating operations shall not exceed 8.75 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.

$$(2.5 \text{ gal/hr})(3.5 \text{ lbs/gal}) = 8.75 \text{ lbs/hr}$$

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b. Emission Limitation:

Emissions of VOC from cleanup operations shall not exceed 48.0 lb/day.

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Applicable Compliance Method:

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

$$(6.4 \text{ gal/day})(7.5 \text{ lbs/gal}) = 48.0 \text{ lbs/day}$$

## c. Emission Limitation:

Total emissions of VOC from K001 and K002, combined, shall not exceed 58.4 tons during any 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of this permit. Initial compliance was determined by multiplying the maximum coating VOC content by the operational limit of 26,900 gallons per year and adding the projected maximum cleanup solvent usage multiplied by the solvent density.

$$[(3.5 \text{ lbs/gal})(26,900 \text{ gal/yr}) + (2120 \text{ gal/yr})(7.5 \text{ lb/gal})](0.0005 \text{ ton/lb}) = 55.0 \text{ tons/yr}$$

## d. Emission Limitation:

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

Applicable Compliance Method:

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

## e. 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 Sections C.1 and C.2 of this permit.

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

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## g. 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: (2.5 gal/hr)(15.58 lbs/gal)(0.88 solids)(0.75 transfer)(0.02 control) = 0.514 lb/hr

## h. 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

## i. 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.