

Synthetic Minor Determination and/or Netting Determination

Permit To Install 08-04397

A. Source Description

Cascade Corporation operates a miscellaneous metal parts coating facility in Springfield, Ohio. Cascade currently has four paint booths and has applied for a PTI to modify one of the paint booths and to install a fifth. Emissions unit K003 is being modified to allow an increase VOC emissions due to a change in coatings and production changes. The new booth (K007) will be identical to emissions unit K003. Both booths will also be equipped with infrared drying ovens. The worst-case coating to be applied in each emissions unit is a urethane coating that has a VOC content of 2.74 pounds/gallon.

B. Facility Emissions and Attainment Status

Cascade has a facility wide potential to emit VOC in excess of 100 tons (143.6 tons) and a single HAP (15.05 tons glycol ethers) in excess of 10 tons that exceed the Title V major source thresholds. This potential to emit is based on maximum application rates and maximum VOC concentrations (5.71 pounds VOC/gallon for K002, and 3.5 pounds VOC/gallon for K003, K005, K006 and K007) allowed for each booth according to OAC rule 3745-21-09(U) operating 8,760 hours per year. This application is requesting a federally enforceable synthetic minor restrictions of 52.5 pounds VOC/day and solvent based coatings use of 2.5 gallons/hour and 15 gallons/day be placed on emissions units K003 and K007.

In order to ensure that Cascade remains below the major source threshold Cascade is requesting federally enforceable limits on VOC emissions (42.96 tons), 24.9 tons of combined HAP emissions and emissions of a individual HAPs to 9.9 tons per year from the entire facility.

C. Source Emissions

VOC Emissions from each booth (K003 and K007) will be limited to 52.5 lbs/day and 9.58 tons/year (52.5 lbs VOC/day X 365 days/year). The unrestricted potential to emit for the two booths is 3.5 lbs VOC/gallon multiplied by a 2.5 gallon/hour maximum application rate for 8,760 hours (38.33 tons per booth, 76.66 tons combined). By imposing a VOC limit of a 52.5 lbs VOC/day and 15 gallons/day of solvent based coatings (15 gallons/day x 2.74 lbs VOC/gallon = 52.5 lbs VOC/day) on K003 and K007, the potential to emit from these two booths is reduced from 76.66 tons to 19.16 tons of VOC. Cascade has requested to keep the VOC content limit of 3.5 lbs VOC/gallon allowed by OAC rule 3745-21-09(U)(1)(c) to allow operating flexibility. Daily record keeping requirements to track coatings use and composition have been included to ensure that the daily limits are not exceeded for K003 and K007. K003 and K007 will not apply any coatings that contain HAPs.

The emissions from K003 and K007 will not include HAPs but do include the emissions of several compounds considered air toxics. The combined emissions from K003 and K007 are expected to include 10.8 tons per year of n-butyl acetate and 3.34 tons per year of methyl-amyl ketone, emissions of other toxics will be less than one ton per year. Acetone will be used as the cleaning solvent for these booths.

D. Conclusion

By imposing a limit of 52.5 lbs VOC/day and 15 gallons of solvent based coatings on emissions units K003 and K007, the potential to emit from these two booths is reduced from 76.66 tons of VOC to 15.0 tons of VOC and for the entire facility will be reduced to 86.1 (143.6 - 57.5) tons VOC per year. Voluntary VOC emissions limits have been included for the other three emissions units (K002; 8.33 tons VOC/year, K005; 10.5 tons VOC/year and K006; 5.0 tons VOC/year) at the facility to further reduce the total allowable annual emissions from the facility to 42.96 tons VOC/year. A facility wide limit of 24.9 tons of combined HAP emissions and 9.9 tons per year of individual HAPs use has also been incorporated into this PTI.. Facility wide monitoring and record keeping requirements have been included to ensure that these limits are not exceeded. These limitations will allow Cascade to operate as a synthetic minor source with regard to Title V operating permits and the Miscellaneous Metal Parts Coating MACT (Subpart M MMM) when it is promulgated.

The monitoring and recordkeeping requirements for the three other emissions units (K002, K005 and K006) at Cascade are being modified to include the facility wide limit of 24.9 tons of combined HAP emissions and 9.9 tons per year of individual HAPs. These modifications include the same facility wide monitoring and record keeping requirements to ensure that the annual HAP emissions limits are not exceeded.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
CLARK COUNTY**
Application No: 08-04397

DATE: 8/6/2002

Cascade Corp
Larry Brunke
2501 Sheridan Ave
Springfield, OH 45505-2519

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 08-04397

Application Number: 08-04397
APS Premise Number: 0812100207
Permit Fee: **To be entered upon final issuance**
Name of Facility: Cascade Corp
Person to Contact: Larry Brunke
Address: 2501 Sheridan Ave
Springfield, OH 45505-2519

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2501 Sheridan Ave
Springfield, Ohio**

Description of proposed emissions unit(s):
K003 modification to increase allowables, chapter 31 replacing 08-03971 issued 4-7-99; spray paint booth and oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized 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 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

- 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 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

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) 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 | 42.96 |
| OC | 0.9 |

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> |
|---|--------------------------------------|---|
| K002 (Binks Paint Spray Booth #3) Manual Spray Paint Booth | OAC rule 3745-31-02(A)(2) | 8.33 tons VOC per year, including cleanup. |
| | OAC Rule 3745-35-07(B) | The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(2)(e). |
| | | Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis. |
| | 3745-21-09(U)(2)(e) | Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. |
| | | Use less than eight gallons per day of coating. |

2. Additional Terms and Conditions

- 2.a None

B. Operational Restrictions

1. The maximum daily coating use for this emissions unit shall not exceed eight gallons.

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Emissions Unit ID: K002

Case:

PTI /

Emissions Unit ID: **K002**

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied in the coating line.
 - c. The total volume, in gallons, of all the coatings applied in the coating line.

2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon, (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
 - f. The name and identification number of each cleanup material, as employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content, in pounds of OC per gallon, of each cleanup material employed
 - i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
 - j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i)).

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- k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).

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PTI

Emissions Unit ID: **K002**

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- l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating booth applied more than eight gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - b. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.1.c of the General Terms and Conditions.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, in gallons.
 - b. The total VOC emissions, in tons, from coating materials as applied.
 - c. The total OC emissions, in tons, from cleanup materials as employed.
 - d. The total individual HAP emissions, in tons, from coating usage and cleanup materials

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employed facility wide.

- e. The total combined HAP emissions, in tons, from coating usage and cleanup materials employed facility wide.

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These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1. Emission Limitation-
Less than or equal to 8 gallons/day of coatings usage.

Applicable Compliance Method-
Compliance shall be based on the recordkeeping specified in Section C.1.

2. Emission Limitation -
8.33 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in section C.2. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification that maintains facility wide HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

Case:

PTI /

Emissions Unit ID: **K003**

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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> |
|--|--------------------------------------|---|
| K003 - Manual spray booth, with an infrared drying oven; misc. metal parts *Modification | OAC rule 3745-31-05(A)(3) | 52.5 lbs VOC/day, excluding cleanup. 0.45 ton OC/year clean up material. |
| | OAC rule 3745-35-07(B) | The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(1)(c). VOC emissions shall not exceed 9.58 tons per year (TPY) including cleanup on a 12 month rolling basis. |
| | OAC rule 3745-21-09(U)(1)(c) | Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis. Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents. |

2. Additional Terms and Conditions

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Emissions Unit ID: K003

2.a None.

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B. Operational Restrictions

1. The maximum annual solvent based coating usage for this emissions unit shall not exceed 5,475 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative Solvent Based Coating Usage</u> |
|-----------------|---|
| 1 | 456.25 |
| 1-2 | 912.5 |
| 2-3 | 1,368.75 |
| 3-4 | 1,825.0 |
| 4-5 | 2,281.25 |
| 5-6 | 2,737.5 |
| 6-7 | 3,193.75 |
| 7-8 | 3,650.0 |
| 8-9 | 4,106.25 |
| 9-10 | 4,562.5 |
| 10-11 | 5,018.75 |
| 11-12 | 5,475.0 |

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

2. Solvent based coatings usage in this emissions unit shall not exceed 15.0 gallons per day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, (excluding water and exempt solvents), as applied.
 - d. The total VOC emissions from all coatings applied, in pounds per day, for this emissions

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unit (the sum of b times c for each coating).

2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
 - f. The name and identification number of each cleanup material, as employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The OC content of each cleanup material employed, in pounds of OC per gallon.
 - i. The individual HAP content of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
 - j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i)).
 - k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
 - l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).

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- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
 - n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).
 - o. The total number of days each booth is in operation per month.
3. The permit to install for this emissions unit K003 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: n-butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 9.85*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 702.4

MAGLC (ug/m3): 16,976

Pollutant: Methyl n-Amyl Ketone*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate

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than K003.

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.05

Emissions Unit ID: **K003**

Casc

PTI

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Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 218

MAGLC (ug/m3): 5,548

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 still 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.).
4. 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.

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

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satisfies the "Air Toxic Policy"; and

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- 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 Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the 52.5 pounds VOC per day limit was exceeded for this emissions unit.
 - b. All days when solvent based coatings usage in this emissions unit exceeded 15.0 gallons per day.
 - c. Exceedances of the rolling 12-month coating usage limitation.
 - d. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - e. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.1.c of the General Terms and Conditions.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, based on a 12 month rolling summation, in tons.
 - b. The total VOC emissions, in tons from coating materials as applied.
 - c. The total OC emissions, in tons from cleanup materials as employed.
 - d. The total individual HAP emissions from coating usage and cleanup materials employed facility wide.
 - e. The total combined HAP emissions from coating usage and cleanup materials employed

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facility wide.

Emissions Unit ID: **K003**

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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 -
52.5 lbs VOC/day

Applicable Compliance Method -
Compliance shall be determined as follows:

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon.

b. Emission Limitation -
9.58 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly VOC emission rates for the previous 12 months in pounds or tons.

c. Emission Limitation -
0.45 TPY OC from cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the summation of the monthly OC emission rates from cleanup activities for the previous 12 months in pounds or tons.

d. Emission Limitation -
3.50 lbs VOC/gallon coatings, excluding water and exempt solvents

Applicable Compliance Method -

Cascade Corp

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Emissions Unit ID: **K003**

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification of PTI 08-3971 issued April 7, 1999 and represents a VOC emissions increase for emissions unit K003 and a change in the type of coatings applied. The adjustment in VOC emissions allows for production increases in this emissions unit and the installation of another emissions unit at the facility while maintaining VOC and HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

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PTI /

Emissions Unit ID: **K005**

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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> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| K005 Hydraulic Cylinder Paint System, miscellaneous metal parts | OAC rule 3745-31-02(A)(2) | 1.5 tons volatile organic compound(VOC) per month and 10.5 tons VOC per year including cleanup. |
| | | The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and 3745-21-09(U)(1)(c). |
| | OAC rule 3745-35-07(B) | Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis. |
| | | Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. |
| | OAC rule 3745-21-09(U)(1)(c) | 3.5 lbs VOC/gal of coating, excluding water and exempt solvents |

2. Additional Terms and Conditions

2.a None

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Emissions Unit ID: **K005**

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Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

B. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified above.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt solvents), as applied.
 - d. The name and identification of each cleanup material employed.
 - e. The VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material.
 - f. The volume, in gallons of each cleanup material employed.
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month.
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined

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HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).

- f. The name and identification number of each cleanup material, as employed.
- g. The volume, in gallons, of each cleanup material employed.
- h. The OC content of each cleanup material employed, in pounds of OC per gallon.
- i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
- j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i).
- k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
- l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).

D. Reporting Requirements

- 1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

2. The permittee shall submit quarterly (excursion) reports that identify:
 - a. Each month during which the monthly VOC emissions from the coatings and cleanup materials exceeded 1.5 tons VOC/month.
 - b. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - c. Exceedances of the rolling 12-month facility wide combined HAP limitation.
3. The permittee shall also submit annual reports which specify:
 - a. the total VOC emissions from this emissions unit, in tons.
 - b. The total individual HAP emissions, in tons from coating usage and cleanup materials employed facility wide.
 - c. The total combined HAP emissions, in tons from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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-
1.5 tons VOC/month including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in section C.1. and shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon divided by 2,000 pounds per ton.
 - b. Emission Limitation-
10.5 tons VOC/yr including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in section C.1. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

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- c. Emission Limitation -
3.50 lbs VOC/gallon coatings, excluding water and exempt solvents

Applicable Compliance Method -

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

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PTI Modification 08-1450
Issue

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Emissions Unit ID: K005

F. Miscellaneous Requirements

1. The terms and conditions in section A, B, C, D and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification of PTI 08-1450 that maintains facility wide HAP emissions below major source levels to avoid Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

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Emissions Unit ID: **K006**

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

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> |
|--|--------------------------------------|---|
| K006 Binks Spray Paint Booth, Misc. Metal Parts | OAC rule 3745-31-02(A)(2) | The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(2)(e). |
| | | Less than or equal to seven gallons per day coating usage |
| | | 5.0 TPY of volatile organic compounds (VOC), including cleanup |
| | OAC rule 3745-35-07(B) | Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis. |
| | OAC rule 3745-21-09(U)(2)(e) | Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. |
| | | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2) |

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Emissions Unit ID: **K006**

2. Additional Terms and Conditions

2.a None

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Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

B. Operational Restrictions

1. The maximum daily coating use for this emissions unit shall not exceed seven gallons.

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 coating applied.
 - b. the volume, in gallons, of each coating material applied.
 - c. the total volume, in gallons, of all of the coatings applied.
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon, (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
 - f. The name and identification number of each cleanup material, as employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed, in pounds of OC per gallon of cleanup material employed.
 - i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.

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- j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i).
- k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
- l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating booth applied more than seven gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - b. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.1.c of the General Terms and Conditions.

- 3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District

Office or local air agency) for this emissions unit that specify:

- a. The total annual coatings usage, based on a 12 month rolling summation, in tons.
- b. The total VOC emissions, in tons from coating materials as applied and cleanup materials.
- c. The total OC emissions, in tons from cleanup materials as employed.
- d. The total individual HAP emissions from coating usage and cleanup materials employed facility wide.

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- e. The total combined HAP emissions from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emission Limitation-
Less than or equal to seven gallons/day of coatings usage.

Applicable Compliance Method-
Compliance shall be based on the recordkeeping specified in Section C.1.

- b. Emissions Limitation:
5.0 TPY of VOC, including cleanup

Applicable Compliance Method:
Compliance shall be demonstrated by the annual sum of monthly VOC emission rates based upon the record keeping requirements specified in sections C.1 and C.2. shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification of PTI 08-1687 that maintains facility HAP emissions below major source levels to avoid Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

Case:

PTI /

Emissions Unit ID: **K007**

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

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> |
|--|--------------------------------------|---|
| K007 - Manual spray booth, with an infrared drying oven; misc. metal parts | OAC rule 3745-31-05(A)(3) | 52.5 lbs VOC/day, excluding cleanup. 0.45 tons OC/ year clean up. |
| | | The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07 and 3745-21-09(U)(1)(c). |
| | OAC rule 3745-35-07(B) | VOC emissions shall not exceed 9.58 tons per year (TPY) including cleanup on a 12 month rolling basis. Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis. |
| | OAC rule 3745-21-09(U)(1)(c) | Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents. |

2. Additional Terms and Conditions

- 2.a None.

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PTI A----- 08 04207
Issue

Facility ID: 0812100207

Emissions Unit ID: **K007**

Case:

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Emissions Unit ID: **K007**

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B. Operational Restrictions

1. The maximum annual solvent based coating usage for this emissions unit shall not exceed 5,475 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative Solvent Based Coating Usage</u> |
|-----------------|---|
| 1 | 456.25 |
| 1-2 | 912.5 |
| 2-3 | 1,368.75 |
| 3-4 | 1,825.0 |
| 4-5 | 2,281.25 |
| 5-6 | 2,737.5 |
| 6-7 | 3,193.75 |
| 7-8 | 3,650.0 |
| 8-9 | 4,106.25 |
| 9-10 | 4,562.5 |
| 10-11 | 5,018.75 |
| 11-12 | 5,475.0 |

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

2. Solvent based coatings usage in this emissions unit shall not exceed 15.0 gallons per day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, (excluding water and exempt solvents), as applied.
 - d. The total VOC emissions from all coatings applied, in pounds per day for this emissions unit (the sum of b times c for each coating).

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Emissions Unit ID: **K007**

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2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating material applied.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
 - f. The name and identification number of each cleanup material, as employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed, in pounds of OC per gallon.
 - i. The individual content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
 - j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i)).
 - k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
 - l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
 - m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g

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times i for each cleanup material).

- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating plus and sum of g times j for each cleanup material).
 - o. The total number of days each booth is in operation per month.
3. The permit to install for this emissions unit K007 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: n-butyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 9.85*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 702.4

MAGLC (ug/m³): 16,976

Pollutant: Methyl n-Amyl Ketone

TLV (mg/m³): 233

Maximum Hourly Emission Rate (lbs/hr): 3.05*

*This emissions rate represents a worst case scenario where the combined emissions from

Emissions Unit ID: **K007**

emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 218

MAGLC (ug/m3): 5,458

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.).
4. 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.

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,

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- 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.

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D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the 52.5 pounds VOC per day limit was exceeded for this emissions unit.
 - b. All days when solvent based coatings usage in this emissions unit exceeded 15.0 gallons per day.
 - c. Exceedances of the rolling 12-month coating usage limitation.
 - d. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - e. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.1.c of the General Terms and Conditions.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, based on a 12 month rolling summation, in tons.
 - b. The total VOC emissions, in tons from coating materials as applied.
 - c. The total OC emissions, in tons from cleanup materials as employed.
 - d. The total individual HAP emissions from coating usage and cleanup materials employed facility wide.
 - e. The total combined HAP emissions from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar

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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 -
52.5 lbs VOC/day

Applicable Compliance Method -
Compliance shall be determined as follows:

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon.

b. Emission Limitation -
9.58 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly VOC emission rates for the previous 12 months in pounds or tons.

c. Emission Limitation -
0.45 TPY OC from cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the summation of the monthly OC emission rates from cleanup activities for the previous 12 months in pounds or tons.

d. Emission Limitation -
3.50 lbs VOC/gallon coatings, excluding water and exempt solvents

Applicable Compliance Method -
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the

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USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

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F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.