

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

Permit To Install **08-04668**

A. Source Description

Findlay Industries, Inc. - Springfield Division, 0812100525, makes interior trim component parts (such as head liners, door panels and miscellaneous trim) for the commercial truck industry. Currently, there are 3 emissions units at the facility; K001 (Spray Table #1), K002 (Spray Table #2) and K003 (Spray Table #3). Adhesives are sprayed onto parts by hand-held pneumatic spray guns. Adhesive is supplied to the spray guns directly from a 55-gallon drum.

B. Facility Emissions and Attainment Status

The facility is located in Clark County, which is attainment for all major criteria pollutants except ozone, which is classified as basic nonattainment. The facility is currently classified as a Title V facility. Without federally enforceable restrictions in place, the facility's potential OC, single HAP and combined HAP emissions are 969 TPY, 155 TPY, and 287 TPY, respectively. The emissions are estimated by making the conservative assumption that each spray gun sprays at maximum capacity for the entire year.

C. Source Emissions

After obtaining this Synthetic Minor PTI 08-04668, the facility will no longer be classified as a major stationary source; it will be a synthetic minor. With federally enforceable restrictions in place, the facility's potential OC, single HAP and combined HAP emissions are 21.9 TPY, 9.9 TPY, and 24.9 TPY, respectively.

D. Conclusion

The terms and conditions in this Synthetic Minor Permit to Install will limit the facility to less than the major source threshold for OC, single HAP and combined HAP emissions (100 TPY, 10 TPY and 25 TPY, respectively). Therefore, the facility is not considered a major stationary source for both nonattainment and Title V applicability. Potential emissions have been limited through coatings restrictions and through the inclusion of appropriate monitoring, record keeping and reporting requirements.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 08-04668

Fac ID: 0812100525

DATE: 3/31/2005

Findlay Industries, Inc.
Doug Kuenzli
400 Fostoria Rd.
Findlay, OH 45840

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 **\$600** 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

RAPCA

Miami Valley Regional Planning Commission

IN

CLARK COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04668 FOR AN AIR CONTAMINANT SOURCE FOR
Findlay Industries, Inc.**

On 3/31/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Findlay Industries, Inc.**, located at **5225 Prosperity Drive, Springfield, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04668:

ch 31 modification replacing 08-03918 issued 9/30/98 to increase emission limits and SMTV to get out of TV.

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main, Dayton, OH 45422-1280 [(937)225-4435]



**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 08-04668

Application Number: 08-04668
Facility ID: 0812100525
Permit Fee: **To be entered upon final issuance**
Name of Facility: Findlay Industries, Inc.
Person to Contact: Doug Kuenzli
Address: 400 Fostoria Rd.
Findlay, OH 45840

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5225 Prosperity Drive
Springfield, Ohio**

Description of proposed emissions unit(s):
ch 31 modification replacing 08-03918 issued 9/30/98 to increase emission limits and SMTV to get out of TV.

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

Findlay Industries, Inc.

Facility ID: 0812100525

PTI Application: 08-04668

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

Findlay Industries, Inc.

Facility ID: 0812100525

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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.

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If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Findlay Industries, Inc.

Facility ID: 0812100525

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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>
OC	21.9
Single HAP	9.9
Combined HAP	24.9

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>
K001 - Spray Table No. 1 Modification*	OAC rule 3745-31-05(A)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day, including cleanup.
	OAC rule 3745-31-05(C) (Synthetic Minor to avoid non attainment provisions)	OC emissions from this emissions unit shall not exceed 7.3 TPY OC per rolling 365-day period, including cleanup.
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	Individual hazardous air pollutant (HAP) emissions from emissions units K001 thru K003 shall not exceed 9.9 tons per rolling 365-day period. Combined HAP emissions from emissions units K001 thru K003 shall not exceed 24.9 tons per rolling 365-day period.
	OAC rule 3745-21-07(G)	See A.2.a

2. Additional Terms and Conditions

- 2.a The 8.0 lbs/hr and 40.0 lbs/day emissions limits specified by OAC 3745-31-05(A) above are equivalent to those specified by OAC 3745-21-07(G)(2) when the emissions unit is employing photochemically reactive materials (PRM). These limits are more stringent than those specified by OAC 3745-21-07(G)(2) when the emissions unit is employing non-PRM. Emissions unit K001 can employ either PRM or non-PRM.

B. Operational Restrictions

1. The OC content of the coating and cleanup materials employed in this emissions unit shall not exceed 6.7 pounds per gallon.
2. The annual coating and cleanup material usage for this emissions unit shall not exceed 2,179 gallons based on a rolling 365-day summation. The permittee has existing coating and cleanup material usage records for this emissions unit and therefore it is not necessary to restrict this emissions unit's coating and cleanup material usage on a monthly basis after the final air permit to install is issued.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup material, in pounds per gallon.
 - d. The total OC emission rate for all coatings and cleanup materials, in pounds per day (the sum of (b) times (c)).
 - e. The total number of hours this emissions unit was in operation.
 - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The rolling 365-day summation of the coating and cleanup material usage, calculated by adding the current day's coatings and cleanup materials usage to the coatings and cleanup materials usage for the preceding 364 calendar days.

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- h. The rolling 365-day summation of OC emissions, calculated by adding the current day's OC emissions in term C.1.d to the daily OC emissions for the preceding 364 calendar days.

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

2. The permittee shall collect and record the following information each day for emissions units K001 thru K003:
 - a. The name and identification number of each coating, as applied.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
 - d. The number of gallons of each coating employed.
 - e. The name and identification number of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material employed.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material employed (sum all the individual HAP contents from f).
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per day and tons per rolling 365-day period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material).
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per day and tons per rolling 365-day period (for each HAP, the sum of c times d for each coating and the sum of g times h for each cleanup material).

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the

Findlay Industries, Inc.**PTI Application: 08 04669****Issued****Facility ID: 0812100525****Emissions Unit ID: K001**

Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (coating materials) employed, and the design parameters of the emissions units 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 summarized the results of the modeling for the "worst-case" pollutant(s).

Findla**PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

Pollutant: Toluene

TLV(ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 2.34 (includes K001, K002 and K003)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 570.1 (includes K001, K002 and K003)

MAGLC(ug/m3): 4485

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745 15 05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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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 submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. Each day during which the average hourly organic compound emissions from the coatings and clean up materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day (for this emissions unit).
 - b. Each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day. (for this emissions unit).
 - c. The rolling, 365-day OC emission limitation of 7.3 tons per year (for this emissions unit).
 - d. The rolling, 365-day individual HAP emission limitation of 9.9 tons per year (for emissions units K001 thru K003).
 - e. The rolling, 365-day combined HAP emission limitation of 24.9 tons per year (for emissions units K001 thru K003).
 - f. The coating material OC content limitation of 6.7 pounds per gallon (for this emissions unit).
 - g. The rolling, 365-day coating and cleanup material usage limitation of 2,179 gallons per year (for this emissions unit).

The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports which specify the total following:
 - a. The total OC emissions from this emissions unit, in tons on a rolling 365-day basis.
 - b. The total individual HAP emissions from emissions units K001 thru K003, in tons on a rolling 365-day basis.
 - c. The total combined HAP emissions from emissions units K001 thru K003, in tons on a rolling 365-day basis.
 - d. The annual coating and cleanup material usage for this emissions unit, in gallons on a rolling 365-day basis.

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 allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.0 lbs/hr OC

Applicable Compliance Method:
Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.
 - b. Emission Limitation:
40.0 lbs/day OC

Applicable Compliance Method:
Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.
 - c. Emission Limitation:
7.3 TPY OC per rolling 365-day period

Applicable Compliance Method -
Compliance shall be demonstrated in accordance with the record keeping requirements

Findla**PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

specified in Section C.1.

- d. Emission Limitation:
9.9 TPY individual HAP per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.2.

- e. Emission Limitation:
24.9 TPY combined HAP per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

F. Miscellaneous Requirements

1. * The terms for emissions unit K001 in this permit supercede those identified in PTI 08-3918 issued 9/30/1998 and represents a 3.65 tons/yr increase of OC emissions. Note that permitting action 08-3918 was a modification of emissions unit K001 that was already installed and therefore did not trigger OAC rule 3745-31-28 at that time. OAC rule 3745-31-28 was effective for emissions units installed after June 29, 1998.
2. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: Sections A, B, C.1, C.2, D, E, and F.

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>
K002 - Spray Table No. 2 Modification*	OAC rule 3745-31-05(A)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day, including cleanup.
	OAC rule 3745-31-05(C) (Synthetic Minor to avoid non attainment provisions)	OC emissions from this emissions unit shall not exceed 7.3 TPY OC per rolling 365-day period, including cleanup.
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	Individual hazardous air pollutant (HAP) emissions from emissions units K001 thru K003 shall not exceed 9.9 tons per rolling 365-day period.
		Combined HAP emissions from emissions units K001 thru K003 shall not exceed 24.9 tons per rolling 365-day period.
	OAC rule 3745-21-07(G)	See A.2.a

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Findla

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

Findla**PTI A**Emissions Unit ID: **K002****Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The 8.0 lbs/hr and 40.0 lbs/day emissions limits specified by OAC 3745-31-05(A) above are equivalent to those specified by OAC 3745-21-07(G)(2) when the emissions unit is employing photochemically reactive materials (PRM). These limits are more stringent than those specified by OAC 3745-21-07(G)(2) when the emissions unit is employing non-PRM. Emissions unit K001 can employ either PRM or non-PRM.

B. Operational Restrictions

1. The OC content of the coating and cleanup materials employed in this emissions unit shall not exceed 6.7 pounds per gallon.
2. The annual coating and cleanup material usage for this emissions unit shall not exceed 2,179 gallons based on a rolling 365-day summation. The permittee has existing coating and cleanup material usage records for this emissions unit and therefore it is not necessary to restrict this emissions unit's coating and cleanup material usage on a monthly basis after the final air permit to install is issued

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup material, in pounds per gallon.
 - d. The total OC emission rate for all coatings and cleanup materials, in pounds per day (the sum of (b) times (c)).
 - e. The total number of hours this emissions unit was in operation.
 - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The rolling 365-day summation of the coating and cleanup material usage, calculated by adding the current day's coatings and cleanup materials usage to the coatings and cleanup materials usage for the preceding 364 calendar days.

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- h. The rolling 365-day summation of OC emissions, calculated by adding the current day's OC emissions in term C.1.d to the daily OC emissions for the preceding 364 calendar days.

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

2. The permittee shall collect and record the following information each day for emissions units K001 thru K003:
 - a. The name and identification number of each coating, as applied.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
 - d. The number of gallons of each coating employed.
 - e. The name and identification number of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material employed.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material employed (sum all the individual HAP contents from f).
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per day and tons per rolling 365-day period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material).
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per day and tons per rolling 365-day period (for each HAP, the sum of c times d for each coating and the sum of g times h for each cleanup material).

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents

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contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

3. The permit to install for this emissions unit K002 was evaluated based on the actual materials (coating materials) employed, and the design parameters of the emissions units 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

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(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 summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Toluene

TLV(ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 2.34 (includes K001, K002 and K003)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 570.1 (includes K001, K002 and K003)

MAGLC(ug/m3): 4485

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant

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emissions are greater than the de minimis level in OAC rule 3745 15 05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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 submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. Each day during which the average hourly organic compound emissions from the coatings and clean up materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day (for this emissions unit).
 - b. Each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day. (for this emissions unit).
 - c. The rolling, 365-day OC emission limitation of 7.3 tons per year (for this emissions unit).
 - d. The rolling, 365-day individual HAP emission limitation of 9.9 tons per year (for emissions units K001 thru K003).
 - e. The rolling, 365-day combined HAP emission limitation of 24.9 tons per year (for emissions units K001 thru K003).
 - f. The coating material OC content limitation of 6.7 pounds per gallon (for this emissions unit).
 - g. The rolling, 365-day coating and cleanup material usage limitation of 2,179 gallons per

year (for this emissions unit).

The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports which specify the total following:
 - a. The total OC emissions from this emissions unit, in tons on a rolling 365-day basis.
 - b. The total individual HAP emissions from emissions units K001 thru K003, in tons on a rolling 365-day basis.
 - c. The total combined HAP emissions from emissions units K001 thru K003, in tons on a rolling 365-day basis.
 - d. The annual coating and cleanup material usage for this emissions unit, in gallons on a rolling 365-day basis.

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 allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.0 lbs/hr OC

Applicable Compliance Method:
Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.
 - b. Emission Limitation:
40.0 lbs/day OC

Applicable Compliance Method:
Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.
 - c. Emission Limitation:

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7.3 TPY OC per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.

- d. Emission Limitation:
9.9 TPY individual HAP per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.2.

- e. Emission Limitation:
24.9 TPY combined HAP per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

F. Miscellaneous Requirements

1. * The terms for emissions unit K001 in this permit supercede those identified in PTI 08-3918 issued 9/30/1998 and represents a 3.65 tons/yr increase of OC emissions. Note that permitting action 08-3918 was a modification of emissions unit K001 that was already installed and therefore did not trigger OAC rule 3745-31-28 at that time. OAC rule 3745-31-28 was effective for emissions units installed after June 29, 1998.
2. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: Sections A, B, C.1, C.2, D, E, and F.

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 - Spray Table No. 3 Modification*	OAC rule 3745-31-05(A)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day, including cleanup.
	OAC rule 3745-31-05(C) (Synthetic Minor to avoid non attainment provisions)	OC emissions from this emissions unit shall not exceed 7.3 TPY OC per rolling 365-day period, including cleanup.
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	Individual hazardous air pollutant (HAP) emissions from emissions units K001 thru K003 shall not exceed 9.9 tons per rolling 365-day period.
		Combined HAP emissions from emissions units K001 thru K003 shall not exceed 24.9 tons per rolling 365-day period.
	OAC rule 3745-21-07(G)	See A.2.a

2. Additional Terms and Conditions

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- 2.a** The 8.0 lbs/hr and 40.0 lbs/day emissions limitations specified by OAC 3745-31-05(A) above are equivalent to those specified by OAC 3745-21-07(G)(2) when the emissions unit is employing photochemically reactive materials (PRM). These limitations are more stringent than those specified by OAC 3745-21-07(G)(2) when the emissions unit is employing non-PRM. Emissions unit K001 can employ either PRM or non-PRM.

B. Operational Restrictions

1. The OC content of the coating and cleanup materials employed in this emissions unit shall not exceed 6.7 pounds per gallon.
2. The annual coating and cleanup material usage for this emissions unit shall not exceed 2,179 gallons based on a rolling 365-day summation. The permittee has existing coating and cleanup material usage records for this emissions unit and therefore it is not necessary to restrict this emissions unit's coating and cleanup material usage on a monthly basis after the final air permit to install is issued

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup material, in pounds per gallon.
 - d. The total OC emission rate for all coatings and cleanup materials, in pounds per day (the sum of (b) times (c)).
 - e. The total number of hours this emissions unit was in operation.
 - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The rolling 365-day summation of the coating and cleanup material usage, calculated by adding the current day's coatings and cleanup materials usage to the coatings and cleanup materials usage for the preceding 364 calendar days.
 - h. The rolling 365-day summation of OC emissions, calculated by adding the current day's OC emissions in term C.1.d to the daily OC emissions for the preceding 364 calendar

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days.

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

2. The permittee shall collect and record the following information each day from emissions units K001 thru K003:
 - a. The name and identification number of each coating, as applied.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
 - d. The number of gallons of each coating employed.
 - e. The name and identification number of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material employed.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material employed (sum all the individual HAP contents from f).
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per day and tons per rolling 365-day period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material).
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per day and tons per rolling 365-day period (for each HAP, the sum of c times d for each coating and the sum of g times h for each cleanup material).

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

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3. The permit to install for this emissions unit K003 was evaluated based on the actual materials (coating materials) employed, and the design parameters of the emissions units 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 summarized the results of the modeling for the "worst-case" pollutant(s).

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Pollutant: Toluene

TLV(ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 2.34 (includes K001, K002 and K003)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 570.1 (includes K001, K002 and K003)

MAGLC(ug/m3): 4485

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745 15 05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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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 submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. Each day during which the average hourly organic compound emissions from the coatings and clean up materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day (for this emissions unit).
 - b. Each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day. (for this emissions unit).
 - c. The rolling, 365-day OC emission limitation of 7.3 tons per year (for this emissions unit).
 - d. The rolling, 365-day individual HAP emission limitation of 9.9 tons per year (for emissions units K001 thru K003).
 - e. The rolling, 365-day combined HAP emission limitation of 24.9 tons per year (for emissions units K001 thru K003).
 - f. The coating material OC content limitation of 6.7 pounds per gallon (for this emissions unit).
 - g. The rolling, 365-day coating and cleanup material usage limitation of 2,179 gallons per year (for this emissions unit).

The permittee shall submit quarterly deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

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2. The permittee shall submit annual reports which specify the total following:
 - a. The total OC emissions from this emissions unit, in tons on a rolling 365-day basis.
 - b. The total individual HAP emissions from emissions units K001 thru K003, in tons on a rolling 365-day basis.
 - c. The total combined HAP emissions from emissions units K001 thru K003, in tons on a rolling 365-day basis.
 - d. The annual coating and cleanup material usage for this emissions unit, in gallons on a rolling 365-day basis.

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 allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.0 lbs/hr OC

Applicable Compliance Method:
Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.
 - b. Emission Limitation:
40.0 lbs/day OC

Applicable Compliance Method:
Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.1.
 - c. Emission Limitation:
7.3 TPY OC per rolling 365-day period

Applicable Compliance Method -
Compliance shall be demonstrated in accordance with the record keeping requirements

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specified in Section C.1.

- d. Emission Limitation:
9.9 TPY individual HAP per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.2.

- e. Emission Limitation:
24.9 TPY combined HAP per rolling 365-day period

Applicable Compliance Method -

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section C.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

F. Miscellaneous Requirements

1. * The terms for emissions unit K001 in this permit supercede those identified in PTI 08-3918 issued 9/30/1998 and represents a 3.65 tons/yr increase of OC emissions. Note that permitting action 08-3918 was a modification of emissions unit K001 that was already installed and therefore did not trigger OAC rule 3745-31-28 at that time. OAC rule 3745-31-28 was effective for emissions units installed after June 29, 1998.
2. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: Sections A, B, C.1, C.2, D, E, and F.