



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/20/2013

Mr. Russ Painter
McGinnis, Inc.
P.O. Box 534
502 Second St extension
South Point, OH 45680-8897

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0744000168
Permit Number: P0112701
Permit Type: Initial Installation
County: Lawrence

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Ironton Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Portsmouth; Kentucky; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Installation of a new outdoor abrasive blasting (EU F002) and painting (EU K002) area that will use tarps as enclosure during operation.

3. Facility Emissions and Attainment Status:

McGinnis, Inc is located in Lawrence County. Lawrence County is currently designated as attainment area for all criteria pollutants. This facility is a Title V facility classified as a major source under a Title V (Ohio Chapter 3745-77) Permit. The facility is a major source because potential emissions of Volatile Organic Compounds (VOC's) exceed the major source threshold of 100 tons per year for each pollutant.

4. Source Emissions:

The addition of potential annual emissions of VOC from the proposed outdoor painting operation would exceed the PSD thresholds of 250 tons per year for the facility. Therefore, McGinnis has committed to establishing a federally enforceable coating usage restriction to limit the annual emissions on a 12-month rolling summation basis for the pollutant VOC to avoid major NSR PSD major threshold.

Potential annual emissions of PM₁₀ for the proposed outdoor abrasive blasting operation exceed state modeling limits. Therefore, McGinnis, Inc. has committed to establishing a federally enforceable abrasive blasting material usage restriction to limit the annual emissions on a 12-month rolling summation basis for the pollutant PM₁₀ to avoid state modeling requirements.

5. Conclusion:

The terms and conditions of this permit which include federally enforceable operational limitations on the coating usage and abrasive blasting material usage will ensure that the installation of these emissions units will not trigger Major NSR (PSD) for VOC or state modeling requirements for PM₁₀.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	13.9
PM	6.1
PM ₁₀	2.9

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
McGinnis, Inc.

Issue Date: 3/20/2013
Permit Number: P0112701
Permit Type: Initial Installation
Permit Description: Installation of outdoor painting and abrasive blasting operation
Facility ID: 0744000168
Facility Location: McGinnis, Inc.
740 County Rd 1,
South Point, OH 45680-8897
Facility Description: Ship Building and Repairing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Anne Chamberlin, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
McGinnis, Inc.**

Facility ID:	0744000168
Permit Number:	P0112701
Permit Type:	Initial Installation
Issued:	3/20/2013
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
McGinnis, Inc.

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Draft Permit-to-Install

McGinnis, Inc.

Permit Number: P0112701

Facility ID: 0744000168

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0744000168
Facility Description: Barge Repair and Painting Facility
Application Number(s): A0046679
Permit Number: P0112701
Permit Description: Installation of outdoor painting and abrasive blasting operation
Permit Type: Initial Installation
Permit Fee: \$1,400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/20/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

McGinnis, Inc.
740 County Rd 1
South Point, OH 45680-8897

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Scott J. Nally
Director



Draft Permit-to-Install
McGinnis, Inc.
Permit Number: P0112701
Facility ID: 0744000168

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0112701
Permit Description: Installation of outdoor painting and abrasive blasting operation

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	F002
Company Equipment ID:	Outdoor Abrasive Blasting
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Outdoor Paint Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
McGinnis, Inc.
Permit Number: P0112701
Facility ID: 0744000168
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Portsmouth City Health Dept., Air Pollution Unit. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Portsmouth City Health Dept., Air Pollution Unit every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Portsmouth City Health Dept., Air Pollution Unit in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Portsmouth City Health Dept., Air Pollution Unit concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.
- 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 state-only required 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 Portsmouth City Health Dept., Air Pollution Unit. 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 (i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Draft Permit-to-Install
McGinnis, Inc.
Permit Number: P0112701
Facility ID: 0744000168
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install

McGinnis, Inc.

Permit Number: P0112701

Facility ID: 0744000168

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart II, National Emissions Standards for Hazardous Air Pollutant Emissions from Shipbuilding and Ship Repair (Surface Coating). The complete MACT requirements including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

EU ID Operations, Property and/or Equipment Description

K002 Outdoor Painting



Draft Permit-to-Install
McGinnis, Inc.
Permit Number: P0112701
Facility ID: 0744000168
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F002, Outdoor Abrasive Blasting

Operations, Property and/or Equipment Description:

Outdoor abrasive blasting using tarp enclosure

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01	Fugitive particulate matter emissions (PM) shall not exceed 27.0 pounds per hour. Fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM ₁₀) shall not exceed 13.0 pounds per hour. Visible particulate emissions shall not exceed 20% opacity as a 3-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)	Fugitive PM emissions shall not exceed 6.1 tons per year based on a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 2.9 tons per year based on a rolling, 12-month summation. See c)(1).



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. One U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies one U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM or PM₁₀ emissions from this air contaminant source since calculated annual emission rate for PM and PM₁₀ is less than 10 tons/yr taking into account the federally enforceable rule limit under OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The maximum annual abrasive usage for this emissions unit shall not exceed 1,800,000 pounds, based upon a rolling, 12-month summation of the abrasive usage figures.
- (2) Abrasive blasting operations shall be conducted within an enclosure at all times. The enclosure shall be comprised of building walls, curtains, tarps or other suitable control measures used for the purpose of controlling fugitive emissions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for the abrasive material usage:
- a. the monthly abrasive material used in this emission unit, in pounds; and
- b. the rolling, 12-month summation of the abrasive material used, in pounds.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., enclosure/tarp openings, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:



- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. all exceedances of the rolling, 12-month abrasive usage limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., enclosure/tarp openings etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Portsmouth Local Air Agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

Fugitive PM emissions shall not exceed 27.0 pounds per hour.

Fugitive PM₁₀ emissions shall not exceed 13.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly fugitive PM and PM₁₀ limitations shall be determined by multiplying the emission factor from table 13.2.6-1(9/1997) in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 for abrasive blasting (for PM, 27 lb/1000 lbs abrasive and for PM₁₀, 13 lb/1000 lbs abrasive) by the maximum hourly abrasive used (4000 lbs/hr) and by a 75% control efficiency (engineering judgment) for the use of tarps.

c. Emission Limitation:

Fugitive PM emissions shall not exceed 6.1 tons per year based on a rolling, 12-month summation.

Fugitive PM₁₀ emissions shall not exceed 2.9 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual fugitive PM and PM₁₀ limitations shall be determined by multiplying the emission factor from table 13.2.6-1(9/1997) in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 for abrasive blasting (for PM, 27 lb/1000 lbs abrasive and for PM₁₀, 13 lb/1000 lbs abrasive) by the maximum annual abrasive used (1,800,000 lbs/year) and by a 75% control efficiency (engineering judgment) for the use of tarps, and then dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.



2. K002, Outdoor Paint Line

Operations, Property and/or Equipment Description:

Outdoor painting using tarp enclosure

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 1,191.4 pounds per day. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart II. See b)(2)a.
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 13.9 tons per year based on a rolling, 12-month summation. See c)(1).
c.	OAC rule 3745-21-09(U)	This emissions unit is exempt from the requirements of this rule based on OAC rule 3745-21-09(U)(2)(a).
d.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)b and b)(2)c.
e.	40 CFR Part 63.1 – 63.16	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.16 apply.



(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.
- d. For the purposes of this permit, all VOC is considered to be volatile organic hazardous air pollutants (VOHAP).
- e. The permittee shall use extra caution, including the proper employments of tarps and/or other cover and protection apparatus, to control and prevent overspray from coming into contact with the ground, vegetation, water or anything other than the intended work to be coated.

c) Operational Restrictions

- (1) The maximum annual coating (including thinner and cleanup material) usage for this emissions unit shall not exceed 9,500 gallons, based upon a rolling, 12-month summation of the coating usage.
- (2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart II, including the following sections:

63.783 and Table 2 to Subpart II	VOHAP content restrictions in coatings, coating container restrictions
63.785	Compliance procedures and options

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:



Effective Date: To be entered upon final issuance

- a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the rolling, 12-month summation from all coating and cleanup materials employed; and
 - e. the total VOC emissions from all coating and cleanup materials employed, in pounds.
- (2) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials.
- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart II, including the following sections:

63.787(a),(b)(1)(i) and (b)(3)	notification requirements, implementation plan
63.788(a) and (b)	record keeping requirements

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month coating usage limitation.
- The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emission unit in the annual Fee Emission Report.
- (3) The permittee shall submit semiannual reports and other such notifications and reports to the Administrator and/or the Portsmouth Local Air Agency as are required pursuant to 40 CFR Part 63, Subpart II, including the following sections:

63.787(b)(1)(ii)	implementation plan
63.788(c)	semiannual compliance report



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 1,191.4 pounds per day.

Applicable Compliance Method:

The daily emission limitation was determined by multiplying the maximum amount of coating and thinning solvent used (408 gal/day) by and the maximum VOC content of the coating (2.92 lbs/gal).

b. Emission Limitation:

VOC emissions shall not exceed 13.9 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(1).

The annual emission limitation was determined by multiplying the maximum amount of coating and thinning solvent used (9500 gal/yr) by the maximum VOC content of the coating (2.92 lbs/gal), and then dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.