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Facility Name: **MILCOR LTD PARTNERSHIP**

Application Number: **03-1178**

Date: **August 19, 1998**

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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### **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.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Milcor Ltd Partnership** located in **Allen** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification</u>	<u>Source Identification Description</u>	<u>Touch-up spray coating - 2 booths - access doors</u>	<u>BAT Determination</u>
K001 (Modification)	K003 (Modification)	Primer spray coating operation - dual booths - steel panels, doors, hatches	Modification to allow for increase in allowable emissions	Compliance with the Terms and Conditions of this permit, and compliance with the "Air Toxics Policy"
	K003 (Modification)	Modification to allow for increase in allowable emissions		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
			Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or <u>Control/Usage Requirements</u>
			3745-31-05	
Compliance with the Terms and Conditions of this permit, and compliance with the "Air Toxics Policy"			3745-21-09 (U) (2) (e)	53 pounds/day, 9.67 tons/year OC from coating operations
			3745-17-11 (B)	34 pounds/month, 0.2 ton/year OC from clean-up operations
			3745-17-07	0 percent opacity, as a six-minute average
			3745-21-09 (U) (2) (e)	10 gallons or less of coating per day
			3745-17-11 (B)	0.551 pound/hour, 2.41 tons/year particulate emissions (PE)
			3745-17-07	*
			3745-31-05	55 pounds/day, 10.0 tons/year OC from coating operations

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
34 pounds/ month, 0.2 ton/yea r OC from clean-u p operati ons	*			
0 percent opacity , as a six-min ute average				
10 gallons or less of coating per day				
0.551 pound/h our, 2.41 tons/ye ar particu late emissio ns (PE)				

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- \* The emission limit based on this applicable rule is less stringent than the limit established pursuant to OAC 3745-31-05.

#### SUMMARY

#### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	20.1**
PE	4.8**

\*\* This reflects an increase of 7.5 TPY of OC over the previous permit limits. Previous PTIs failed to establish PE limits for spray coating operations.

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

#### MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering

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practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### **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.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

##### **Introduction**

This Permit to Install (PTI) is for proposed modifications and emissions increases for two metal spray coating operations. Previous PTIs were 03-7234 for emissions unit K001 issued October 6, 1993, and 03-7431 for emissions unit K003 issued June 30, 1993.

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**A. Applicable Emission Limitations and/or Control Requirements**

1. No additional emissions limitations/control requirements.

**B. Operational Restrictions**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 03-1178. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the volatile organic compound (OC) emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the 'Screen 3' model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

**K001**

**Pollutant: toluene**

**TLV (ug/m3): 188,000**

**Maximum Hourly Emission Rate (lbs/hr): 3.8**

**Predicted 1 Hour Max. Ground-Level Concentration at the Fenceline (ug/m3): 231**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476**

**K003**

**Pollutant: xylene**

**TLV (ug/m3): 434,000**

**Maximum Hourly Emission Rate (lbs/hr): 6.6**

**Predicted 1 Hour Max. Ground-Level Concentration at the Fenceline (ug/m3): 5268**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333**

(Assumes worst-case scenario of all emissions coming from only 1 exhaust stack, and includes all of the allowable emissions.)

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Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-11178 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table; and,
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

**C. Monitoring and Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for each emissions unit:
  - a. the name and identification number of each coating material employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the OC emissions from each coating, in pounds;
  - e. the OC emissions from all coatings, in pounds; and,

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- f. the total volume, in gallons, of all coatings employed.
2. The permittee shall collect and record the following information each month for each emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the OC content of each cleanup material, in pounds per gallon;
  - d. the OC emissions from each cleanup material, in pounds;
  - e. the total OC emissions from all coatings, in tons;
  - f. the total OC emissions for all cleanup materials, in tons; and,
  - g. the total OC emissions for each emissions unit, in tons.
3. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.
2. Annual written reports of 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, the probable cause of such deviations, and any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Northwest District Office. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The reports shall be

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submitted annually by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

**E. Testing Requirements/ Compliance Method Determinations**

1. Emission Limitation

Emissions units K001:

53 lbs/day, 9.67 tons/yr OC from coating

Emissions units K003:

55 lbs/day, 10.0 tons/yr OC from coating

Emissions units K001 and K003:

34 lbs/mo, 0.2 ton/yr OC from clean-up (each) 10 gallons or less coating per day (each)

Applicable Compliance Method

The recordkeeping requirements in Section C of this permit shall be used to determine compliance with the above limits.

Any determination of OC content, solids content, or density if a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

"OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

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2. Emission Limitation

Emissions units K001 and K003:

0.551 lb/hr particulate emissions (PE), 2.41 tons/yr (each)

Applicable Compliance Method

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

E = particulate matter emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (40 percent considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 90 percent)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

3. Emission Limitation

Emissions units K001 and K003:

0 percent opacity, as a six-minute average

Applicable Compliance Method

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40 CFR 60, Appendix A, Method 9

**F. Miscellaneous Requirements**

1. This PTI supersedes the requirements of PTI 03-7234 and PTI 03-7431.