



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
DARKE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04519

DATE: 9/30/2003

Jafe Decorating Co Inc
Dave Irwin
P.O. Box 359
Greenville, OH 45331-0359

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 9/30/2003
Effective Date: 9/30/2003**

FINAL PERMIT TO INSTALL 08-04519

Application Number: 08-04519
APS Premise Number: 0819070215
Permit Fee: **\$100**
Name of Facility: Jafe Decorating Co Inc
Person to Contact: Dave Irwin
Address: P.O. Box 359
Greenville, OH 45331-0359

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1250 Martin
Greenville, Ohio**

Description of proposed emissions unit(s):
Modification of K006 increasing emissions, chapter 31 replacing 08-04375 issued 2-26-02.

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

Jafe Decorating Co Inc
PTI Application: 08-04519
Issued: 9/30/2003

Facility ID: 0819070215

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

Jafe Decorating Co Inc
PTI Application: 08-04519
Issued: 9/30/2003

Facility ID: 0819070215

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, 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

Jafe Decorating Co Inc
PTI Application: 08-04519
Issued: 9/30/2003

Facility ID: 0819070215

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is 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.

6

Jafe Decorating Co Inc
PTI Application: 08-04519
Issued: 9/30/2003

Facility ID: 0819070215

Jafe Decorating Co Inc
PTI Application: 08 04510
Issued

Facility ID: 0819070215

Emissions Unit ID: **K006**

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.

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds (OC)	13.50

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K006 - Chain-on-edge paint booth. (**Modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(9)(g)
	OAC rule 3745-35-07 (B) Synthetic Minor to avoid Title V permitting	
	OAC rule 3745-21-07(G)(2)	

Jafe D
PTI A
Issued: 9/30/2003

Emissions Unit ID: **K006**

Applicable Emissions
Limitations/Control Measures

The organic compound (OC) emissions from this emissions unit shall not exceed 19.06 lbs/hr and 6.20 tons per year (TPY), as a rolling 365-day summation from operating scenario #3.

The total OC emissions from this emissions unit from operating scenarios #1 & #2 shall not exceed 7.3 TPY.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-35-07(B).

The OC emissions from this emissions unit from operating scenario #3 shall not exceed 6.20 TPY, as a rolling 365-day summation.

See B.1. and B.2.

The total OC emissions from this emissions unit shall not exceed 8.0 lbs/hour and 40.0 lbs/day from operating scenarios #1 & 2.

See A.I.2.d.

2. Additional Terms and Conditions

- 2.a** Emission unit K006 is capable of operating under three different scenarios. The permittee shall employ only one of the following operating scenarios on any one given day:
- i. operating scenario #1: coating operation when the cure oven, P006, is being employed.
 - ii. operating scenario #2: coating operation when the cure oven, P006, is not being employed.
 - iii. operating scenario #3: coating operation utilizing Dupont Tyzor TPT when the cure oven, P006, is not being employed.
- 2.b** When operating scenario #1 is being employed:
For purposes of calculating the organic compound emission rates for this emissions unit, K006 and the associated oven, emissions unit P006, the permittee shall utilize a value of 80% of the organic compounds employed in this emission unit are emitted from emissions unit K006. The remaining 20% of the organic compounds employed in this emissions unit shall be considered as emissions from the associated oven, emissions unit P006. The emissions split between units K006 and P006 is based upon average coating operation data.
- 2.c** When the operating scenarios #2 and #3 are being employed:
For the purposes of calculating organic compound emission rates for this emissions unit when not employing the cure oven, it is not necessary for the permittee to utilize the 80/20 split described above.
- 2.d** In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT), as established pursuant to OAC rule 3745-31-05(A)(3), for this emissions unit while operating under scenario #3, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

B. Operational Restrictions

1. The organic compound content from the Dupont Tyzor TPT coating used in this emission unit shall not exceed 6.88 pounds OC per gallon.
2. The maximum annual usage of the Dupont Tyzor TPT coating, from this emissions unit shall not exceed 1802 gallons/year, based upon a rolling 365-day summation.
To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the Dupont Tyzor TPT usage levels specified in the

following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Dupont Tyzor TPT usage, in gallons</u>
1	150.17
1-2	300.33
1-3	450.50
1-4	600.66
1-5	750.83
1-6	901.00
1-7	1051.17
1-8	1201.33
1-9	1351.50
1-10	1501.67
1-11	1651.83
1-12	1802.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual limitation shall be based upon a rolling, 365-day summation of the daily Dupont Tyzor TPT usage, in gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit when operating scenario #3 is being employed:
 - a. The OC content of Dupont Tyzor TPT as applied, in lbs OC/gallon.
 - b. The total number of gallons of Dupont Tyzor TPT coating employed.
 - c. The total OC emissions of Dupont Tyzor TPT, in pounds per day.
i.e., (a) x (b).
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for the Dupont Tyzor TPT coating, i.e., (c)/(d), in pounds per hour (average).
 - f. During the first 365 calendar days of operation following the issuance of this permit, the

Jafe Decorating Co Inc
PTI Application: 08 04510
Issued

Facility ID: 0819070215

Emissions Unit ID: **K006**

permittee shall record the cumulative Dupont Tyzor TPT coating usage, in gallons.

- d. The total OC emission rate for all coatings and cleanup materials, in pounds per day.
 - e. The total number of hours the 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).
4. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol

TLV (mg/m³): 996.3

Maximum Hourly Emission Rate (lbs/hr): 19.06

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 445.3

MAGLC (ug/m³): 23,720

Pollutant: Benzene

TLV (mg/m³): 1.59

Maximum Hourly Emission Rate (lbs/hr): 0.003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.112

MAGLC (ug/m³): 15.0

Pollutant: Toluene

Jafe Decorating Co Inc
PTI Application: 08 04510
Issued

Facility ID: 0819070215

Emissions Unit ID: **K006**

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 1.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 65.84

MAGLC (ug/m3): 1884.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still 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 deviation (excursion) reports in accordance with general Term and Condition A.2. that identifies the following:
 - a. An identification of each day during which the permittee was operating under scenario #3, when the rolling 365 day limitation of the Dupont Tyzor TPT coating usage, in gallons, exceeded the specified restriction and the actual usage for each such day.
 - b. For the first 365 days of operation following the issuance of this permit, during which the permittee was operating under scenario #3, an identification of each day when an exceedance of the cumulative Dupont Tyzor TPT coating usage restriction, in gallons, occurred and the actual usage for each such day.
 - c. An identification of each day during which the permittee was operating under scenario #1 or #2, when the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - d. An identification of each day during which the permittee was operating under scenario #1 or #2, when the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - e. An identification of each day when the permittee operated under more than one operating scenario.
2. The permittee shall submit an annual report of the OC emissions, in TPY, from each operating scenario #1, #2 and #3. The reports shall be submitted to the Regional Air Pollution Control Agency by January 15 of each 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:
The organic compound (OC) emissions from this emissions unit shall not exceed 19.06 lbs/hr and 6.20 tons per year (TPY), as a rolling 365-day summation from operating scenario #3.

Jafe Decorating Co Inc
PTI Application: 08 04510
Issued

Facility ID: 0819070215

Emissions Unit ID: K006

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

b. Emission Limitation:

The total OC emissions from this emissions unit shall not exceed 8.0 lbs/hour and 40.0 lbs/day from operating scenarios #1 & #2.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2. and C.3.

Jafe D
PTI A
Issued: 9/30/2003

Emissions Unit ID: **K006**

- c. Emission Limitation:
 The total OC emissions from this emissions unit from operating scenarios #1 & #2 shall not exceed 7.3 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.2. and C.3. and shall be a summation of the 365 daily records, while the permittee was operating under scenarios #1 & #2, and divided by 2000 lbs/ton.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. This modification represents an increase of 6.20 TPY OC for emissions unit K006. This PTI 08-04519 supercedes the requirements of PTI 08-04375, issued on February 26, 2002.
2. In order to remain a minor operating facility, Jafe Decorating has accepted a federally enforceable emission limitation for the coatings used in emissions unit K006. With this restriction*, the facility's potential to emit OC will be less than 100 TPY OC.

		<u>PTE</u>	<u>After Federally Enforceable Restrictions</u>
K001	Electric Lehr	41.6	41.6
K002	Small paint booths (2)	7.30	7.30
K003	Large paint booth	7.30	7.30
K006	Paint booth	83.48	13.5*
P006	Curing oven	<u>2.74</u>	<u>2.74</u>
		142.42	72.44

The facility will maintain daily records as outlined in the terms and conditions to demonstrate compliance with the usage and emission restrictions. As the potential emissions of OC are limited to less than the major source thresholds with the 365-day rolling TPY limitation, the facility is not considered a major source for Title V applicability.