

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

Permit To Install #03-16156

A. Source Description

DTR Industries, Inc. has proposed to install an automatic adhesive spray machine (K058) and a glycol dip tank with steam cleaning operation (P073). The automatic adhesive spray machine will be included in the Anti-Vibration Waterborne Coating Operation combined OC limit of 18.00 tons per rolling 365-day period. The glycol dip tank will be included in the Anti-Vibration Glycol Dipping Operations combined limits of 33.00 tons of OC per rolling 12-month period and 9,166,666 parts produced per rolling 12-month period.

B. Facility Emissions and Attainment Status

DTR Industries, Inc. is considered a 'major' facility for Title V and PSD purposes. Allen County is designated attainment for all criteria pollutants.

C. Source Emissions

Installation of the automatic adhesive spray machine and the glycol dip tank will not increase OC emissions at DTR Industries, Inc., as the emissions units will share a combined limit of 18.00 tons of OC per rolling 365-day period and 33.00 tons of OC per rolling 12-month period, respectively.

D. Conclusion

By including emissions units K058 and P073 in existing synthetic minor limits, facility OC emissions will not increase and the significance level for PSD will not be triggered.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
ALLEN COUNTY
Application No: 03-16156**

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
Subpart MMMM	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 4/22/2004

DTR Industries Inc
Kevin Gearig
320 Snider Rd
Bluffton, OH 45817

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

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

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

Very truly yours,

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

CC: USEPA

NWDO

Lima-Allen Regional Planning Commission

IN



**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 03-16156

Application Number: 03-16156

APS Premise Number: 0302000166

Permit Fee: **To be entered upon final issuance**

Name of Facility: DTR Industries Inc

Person to Contact: Kevin Gearig

Address: 320 Snider Rd
Bluffton, OH 45817

Location of proposed air contaminant source(s) [emissions unit(s)]:

**320 Snider Rd
Bluffton, Ohio**

Description of proposed emissions unit(s):

Automatic water-borne paint spray machine and a submerged assembly machine.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.

- b. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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 of state-only enforceable 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 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 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. 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.

4. 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.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

6. 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.

7. 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.

8. 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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	9.37*
PE	0.74

*There is no increase in allowable emissions due to the incorporation of two new emissions units under an existing combined limitation.

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

This facility is subject to 40 CFR Part 63, Subpart M, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart M. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart M. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart M and Subpart A.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K058 - Water-borne Paint Spray Machine No. 13	OAC rule 3745-31-05(A)(3)	0.84 lb of organic compounds (OC)/hour; 3.68 tons of OC/year 0.17 lb of particulate emissions (PE)/hour; 0.74 ton of PE/year Visible particulate emissions shall not exceed 0% opacity as a six-minute average Use of water wash or dry filtration system See Section A.I.2.a
	OAC rule 3745-31-05(C)	18.00 tons of OC per rolling 365-day period from emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052, K053, K057, and K058 combined (See A.I.2.c)
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating
	OAC rule 3745-17-07(A)	See Section A.I.2.b
	OAC rule 3745-17-11(B)	See Section A.I.2.b
	40 CFR Part 63, Subpart M	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(C).
- 2.b** The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** The emissions of OC from Anti-Vibration Water-Borne Painting operations (emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052, K053, K057, and K058 combined) shall not exceed 18.00 tons per year, based upon a rolling, 365-day summation of the daily emissions.

The 18.00 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

Rolling emission limitations for Anti-Vibration Water-Borne Painting operations were initially established in Permit to Install (PTI) #03-13807 issued on December 5, 2002, and, as such, rolling OC emission records exist. The permittee shall use the existing records to determine compliance upon startup. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18.00 tons of OC per rolling 365-day period, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052, K053, K057, and K058 combined:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, in pounds/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;

- e. the OC emission rates from each coating employed ("b" x "d") in pounds/day;
- f. the total OC emission rate from all coatings employed, in pounds/day (summation of "e" for all coatings applied); and
- g. the rolling, 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days after the event occurs.
2. The permittee shall notify the Northwest District Office in writing of any daily record showing the use of a noncompliant coating, or a coating not meeting the restriction of 3.5 lbs of VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record, and it shall be sent to the Northwest District Office within 30 days following the end of the calendar month in which the non-compliant coating was applied.
3. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports which identify any daily record showing the exceedance of the OC limitation of 18.00 tons per rolling 365-day period for the Anti-Vibration Water-Borne Painting Operations, which includes emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052, K053, K057, and K058 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.84 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

* The potential to emit for this emissions unit was based on a maximum hourly coating usage of 0.82 gallon and a maximum OC content of 1.03 lbs per gallon, as applied.

- b. Emission Limitation
3.86 tons of OC/year

Applicable Compliance Method

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation

0.17 lb of PE/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation

0.74 ton of PE/year

Applicable Compliance Method

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. Emission Limitation

18.00 tons of OC per rolling 365-day period from emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052, K053, K057, and K058 combined.

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in Section A.III.2.

f. Emission Limitation

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g. Emission Limitation

3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined in accordance with recordkeeping requirements specified in section A.III.2. Any determination of VOC content*, solids content, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, 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 VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

DTR Industries Inc

PTI Application: 03-16156

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: K058

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K057 - Water-borne Paint Spray Machine No. 13	See B.III.1	See B.III.1

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for emissions unit K058 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 PTI 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 PTI 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: 2-butoxyethanol
 TLV (mg/m3): 96.66
 Maximum Hourly Emission Rate (lbs/hr): 0.72
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 127.6
 MAGLC (ug/m3): 2301.49

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 compositions 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.).
2. 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 PTI 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 PTI prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P073 - Glycol Dip Tank with Steam Cleaning Operation (Submerged Assembling Machine)	OAC rule 3745-31-05(A)(3)	1.30 lbs of organic compounds (OC)/hour; 5.69 tons of OC/year
	OAC rule 3745-31-05(C)	33.00 tons of OC per rolling 12-month period from all emissions units identified in Section A.I.2.a
	OAC rule 3745-21-07(G)	None (see Section A.II.1)

2. Additional Terms and Conditions

- 2.a The emissions of OC from Anti-Vibration Glycol Dipping Process operations, including emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073 combined, shall not exceed 33.00 tons of OC per year, based upon a rolling 12-month summation of the monthly emissions.

The 33.00 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions. The emission limitation is based on the operational restriction contained in Section A.II.2.

Rolling emission limitations for Anti-Vibration Glycol Dipping Process operations were established in Permit to Install (PTI) #03-10256 issued on March 1, 2001, and as such, rolling OC emission records exist. The permittee shall use the existing records to determine compliance upon startup. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- 2.b Best Available Technology (BAT) requirements also include compliance with terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C), is prohibited in this emissions unit.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process Operations, including emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073 (combined), shall not exceed 9,166,666 units per year, based upon a rolling 12-month summation of the production rates for these emissions units.

Annual production restrictions for Anti-Vibration Glycol Dipping Process operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling production records exist. The permittee shall use the existing records to determine compliance upon startup. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit P073:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons, using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound of OC/unit produced})$$
2. The permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073 combined):
 - a. the total production rate, number of units produced;
 - b. the rolling 12-month summation of the production rate, number of units;
 - c. the total OC emissions, in tons; and
 - d. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the rolling 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibration Glycol Dipping Process Operations from emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
1.30 lbs of OC/hour

Applicable Compliance Method

The hourly emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

* The potential to emit is based on a maximum production rate of 180 units/hour and an emission factor of 0.0072 lb of OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. Emission Limitation
5.69 tons of OC/year

Applicable Compliance Method

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation
33.00 tons of OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073 combined)

Applicable Compliance Method

Compliance shall be based upon recordkeeping requirements specified in Section A.III.2.

DTR Industries Inc

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VI. Miscellaneous Requirements

None

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PTI Application: 03-16156

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: P073

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P073 - Glycol Dip Tank with Steam Cleaning Operation (Submerged Assembling Machine)	See B.III.1	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for emissions unit P073 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 PTI 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 PTI 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: Ethylene glycol
 TLV (mg/m3): 73.70
 Maximum Hourly Emission Rate (lbs/hr): 0.82
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.40
 MAGLC (ug/m3): 1754.76

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 compositions 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.).
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The permittee shall collect, record, and retain the following information when it conducts evaluation 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: P073

VI. Miscellaneous Requirements

None