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: FINAL PERMIT TO INSTALL**
**MARION COUNTY**
**Application No: 03-17140**
**Fac ID: 0351010012**

**CERTIFIED MAIL**

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

**DATE:** 12/14/2006

Whirlpool Corporation - Marion Division
Alvin Sykes
1300 Marion-Agosta RD
Marion, OH 43302

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

| | |
|---|---|
| **Permit To Install** | **Issue Date: 12/14/2006** |
| **Terms and Conditions** | **Effective Date: 12/14/2006** |

## FINAL PERMIT TO INSTALL 03-17140

Application Number: 03-17140

Facility ID: 0351010012

Permit Fee: **$200**

Name of Facility: Whirlpool Corporation - Marion Division

Person to Contact: Alvin Sykes

Address: 1300 Marion-Agosta RD
Marion, OH 43302

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1300 Marion-Agosta Rd.**
**Marion**, **Ohio**

Description of proposed emissions unit(s):
**Modification to existing appliance coating line.**

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

Joseph P. Koncelik

Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Record keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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 record keeping 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 record keeping 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

**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 re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

**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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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 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.

**13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## B. State Only Enforceable Permit-To-Install General Terms and Conditions

### 1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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)**

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

**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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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., postmarked), 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

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons Per Year |
|---|---|
| **VOC** | **77.28** |

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

### 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.

**Operations, Property, and/or Equipment - (K008) - Small parts e-coat line**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3)<br><br>(Modification to PTI #03-9333, issued May 8, 1996, to allow for the replacement of the dip tank and increased VOC emissions) | 62.56 lbs volatile organic compounds (VOC)/hr<br><br>See A.I.2.a**.** |
| OAC rule 3745-31-05(C) | 77.28 tons of VOC per rolling, 12-month period (See A.I.2.b.i and A.II.1.) |
| OAC rule 3745-21-09(K)(1) | 2.8 lbs pounds of VOC per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents (See A.I.2.c.) |
| 40 CFR, Part 60, Subpart SS | 0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids |
| 40 CFR, Part 63, Subpart NNNN | Organic HAP emissions to the atmosphere must be limited to no more than 0.13 kg/liter ( 1.1 lbs/gallon) of coating solids used during each compliance period (See A.I.2.d.) |

**2. Additional Terms and Conditions**

**2.a** The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart SS; 40 CFR, Part 63, Subpart NNNN; OAC 3745-21-09(K)(1) and OAC rule 3745-31-05(C).

**2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of the Prevention of Significant Deterioration (PSD) regulations:

i. The VOC emissions shall not exceed 77.28 tons per rolling, 12-month period based on a production restriction (see A.II.1).

**2.c** The VOC content of the coatings employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 2.8 lbs VOC/gallon of coating, as a daily, volume-weighted average, excluding water and exempt solvents.

On any day when coating materials added to the dip tank exceed 2.8 pounds per gallon minus water and exempt solvents, as a daily volume-weighted average, the permittee shall perform a U.S. EPA Method 24 test to ensure that the resulting coating mixture (as applied) complies with the above limitation.

**2.d** The permittee shall comply with all the applicable requirements in 40 CFR, Part 63, Subpart NNNN for this emissions unit (see attachment).

## II. Operational Restrictions

**1.** The maximum annual coating usage rate for this emission unit shall not exceed 168,000 gallons per year, based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceablility during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum Allowable Coating Usage Rate (gallons) |
|---|---|
| 1 | 14,000 |
| 1-2 | 28,000 |
| 1-3 | 42,000 |
| 1-4 | 56,000 |
| 1-5 | 70,000 |
| 1-6 | 84,000 |
| 1-7 | 98,000 |

| | |
|---|---|
| 1-8 | 112,000 |
| 1-9 | 126,000 |
| 1-10 | 140,000 |
| 1-11 | 154,000 |
| 1-12 | 168,000 |

After the first 12 calendar months of operation, following issuance of this permit, compliance with the annual coating usage restriction shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

**2.** The VOC content of each coating mixture, as applied, shall not exceed 0.92 pound per gallon.

## III. Monitoring and/or Record keeping Requirements

**1.** Each month, the permittee shall determine the monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids, in kilograms per liter, calculated as follows:

a. Calculate the mass of VOC'S consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of ( Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOC'S in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the calendar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the volume-weighted average mass of VOC'S consumed per unit volume of coating solids applied during the calendar month by the following equation:

G = (Mo+Md)/(Ls X T)

where:

G = the volume-weighted average mass of VOC'S in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter)

T = transfer efficiency (0.95)

**2.** The permittee shall collect and record the following information each day for the electrocoating dip tank:

a. The name and identification number of each material added to the dip tank;

b. The VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank;

c. The number of gallons of each material added to the dip tank, excluding water and exempt solvents;

d. The daily, volume-weighted average VOC content of the combination of materials added to the dip tank, excluding water and exempt solvents, i.e., the sum of (b) x

(c) for all the individual materials, divided by the total number of gallons of all materials;

**3.** On days when the permittee adds coating materials to the small parts e-coat line that do not comply with the daily volume-weighted average of 2.8 pounds VOC per gallon of coating, excluding water and exempt solvents, the permittee shall record the results of the required U.S. EPA Method 24 test (See A.I.2.c).

**4.** The permittee shall maintain monthly records of the following information for this emission unit:

a. The coating usage rate, in gallons;

b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;

c. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;

d. The calculated VOC emissions for each month, in tons, using the following equation:

VOC emissions = (0.92 lb VOC/gallon) x (A.III.4.a) x (ton/2000 lbs); and

e. Beginning the first month after the first12 calendar months of operation following the issuance of this permit, the rolling 12-month VOC emissions, in tons.

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC emission limitation of 0.9 kg VOC/liter of coating solids (based on a monthly, volume-weighted average).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**2.** The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeded the applicable limitation of 2.8 pounds VOC/gallon of coating, excluding water and exempt solvents. 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.

**3.** The permittee shall submit quarterly reports of all days when a U.S. EPA Method 24 test was required. If no U.S. EPA Method 24 tests were required to be performed during the

calendar quarter because the daily volume-weighted average VOC contents of materials added to the coating line were less than 2.8 pounds VOC per gallon coating, excluding water and exempt solvents, a statement indicating that fact will still be required.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**4.** The permittee shall submit deviation (excursion) reports which identify the following:

a. All exceedances of the rolling, 12-month VOC emission limitation of 77.28 tons;

b. All exceedances of the rolling, 12-month coatings usage restriction of 168,000 gallons

c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage restrictions specified in section A.II.1; and

d. All exceedances of the 0.92 pound per gallon VOC content.
These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

## V. Testing Requirements

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

a. <u>Emission Limitation:</u> 62.56 lbs VOC/hr

<u>Applicable Compliance Method:</u> The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was calculated based on multiplying the maximum coating usage rate of 68 gallons per hour by the maximum VOC content of 0.92 pound per gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. <u>Emission Limitation:</u> 77.28 tons of OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section A.III.4 of this permit.

c. Emission Limitation: 2.8 lbs pounds of VOC per gallon of coating, as a daily, volume-weighted average, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping required in Section A.III.2 of the terms and conditions of this permit. The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

daily, volume-weighted average = [summation of (Gi X VOCi)] / summation of Gi for i = 1 to n

where:

i = 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day

Gi = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOCi = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents

d. Emission Limitation: 0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids

Applicable Compliance Method: Compliance shall be based upon the record keeping required in Section A.III.1 of the terms and conditions of this permit.

e. Emission Limitation: Organic HAP emissions to the atmosphere must be limited to no more than 0.13 kg/liter ( 1.1 lbs/gallonof coating solids used during each compliance period

Applicable Compliance Method: Compliance shall be based upon the record keeping as required by 40 CFR, Part 63, Subpart NNNN (See attachment A).

**2.** If required, U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings, as applied.

## VI. Miscellaneous Requirements

None

## 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.

**Operations, Property, and/or Equipment - (K008) - Small parts e-coat line**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| None | None |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Record keeping Requirements

**1.** The permit to install for this emissions unit K008 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: 2-butoxyethanol
TLV ($mg/m^3$): 96.66
Maximum Hourly Emission Rate (lbs/hr): 9.59
Predicted 1-Hour Maximum Ground-Level Concentration ($mg/m^3$): 1027
MAGLC ($mg/m^3$): 2301

**2.** 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.).

**3.** If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None