



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

10/31/01

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

03-32-01-0170
Whirlpool Findlay Division
George D. Crosby
4901 North Main Street
Findlay, OH 45840

Dear George D. Crosby:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 05/23/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 10/31/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-32-01-0170 to:
Whirlpool Findlay Division
 4901 North Main Street
 Findlay, OH 45840

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B003 (Paint System Air Makeup) Air makeup for paint system.	are dried in the Finish Paint Oven.	fluidized bed of powder coating, and cured in the postcure oven.
K003 (Electrocoat Prime Coat and Ransburg Finish Paint System) Cathodic E-coat is applied to steel parts, which are dried in the Prime E-Coat Paint Oven. In the Reinforce Paint Booth, finish paint is applied to prime-coated steel parts in specific areas requiring additional finish paint coverage. Finish paint is then applied to reinforced, prime-coated steel parts by the Ransburg applicators. Parts coated with finish paint	K007 (East Dishrack Powder Coating Line) Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.	
	K008 (West Dishrack Powder Coating Line) Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
 347 North Dunbridge Road
 Bowling Green, OH 43402
 (419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. 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.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

- 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 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. 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

powder coat/porcelain furnace, emissions unit K005;
silk screen painting and drying oven, emissions unit K006;
tub mastic operation, emissions unit K009;
door mastic operation, emissions unit K010;
silk screen cold cleaner, emissions unit L001;
powder coat procelain process, emissions unit P009;
cryogenic paint hook stripper, emissions unit P010;
procelain tub brushing booth, emissions unit P011;
paint mix room, emissions unit Z002;
paint removal sanding booth, emissions unit Z003;
maintenance painting operation, emissions unit Z004;
general machining, emissions unit Z005;
plastic presses, emissions unit Z006;
plastic regrind, emissions unit Z007;
assembly carton sealers, emissions unit Z008;
assembly fiberglass insulation application, emissions unit Z009;
back-up generator, emissions unit Z010;
maintenance parts washer, emissions unit Z011;
gray paint air make-up, emissions unit Z012;
white paint air make-up, emissions unit Z013;
porcelain air make-up, emissions unit Z014;
miscellaneous air make-up units, emissions unit Z015;
wastewater pretreatment plant, emissions unit Z016;
hazardous waste building activities, emissions unit Z017;
unpaved roads and parking areas, emissions unit Z018;
pyro testing room, emissions unit Z019; and
distribution center, emissions unit Z020.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint System Air Makeup (B003)
Activity Description: Air makeup for paint system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
12.4 mmBtu/hr, natural gas-fired air make-up system, with liquified petroleum gas (LPG) as back-up fuel	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05 (PTI 03-9387)	0.44 lb carbon monoxide (CO)/hr, 1.93 tons/yr CO
		2.09 lbs nitrogen oxides (NOx)/hr, 9.15 tons/yr NOx
		0.25 lb PE/hr, 1.10 tons/yr PE
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B) and 3745-17-07(A).

2. Additional Terms and Conditions

- 2.a Since natural gas and LPG are the only fuels fired in this emissions unit, OAC Chapter 3745-18 is not applicable. Hence, there is no SO2 emission limitation established for this emissions unit.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or LPG in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or LPG, the permittee shall maintain a record of the type of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or LPG was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- 1.a Emission Limitations: 0.25 lb PE/hr, 1.10 tons/yr PE

Applicable Compliance Method:

When combusting natural gas, the permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft.

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 0.6 lb PE (filterable)/1000 gallons.

Compliance with the annual allowable PE limitation shall be ensured if compliance with the hourly allowable PE limitation is maintained (the annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

- 1.b Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method:

When combusting natural gas, the permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (12.4 mmBtu/hr).

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 0.6 lb PE (filterable)/1000 gallons, and then dividing by the maximum heat input capacity of the boiler (12.4 mmBtu/hr).

If required, compliance with the lb PE/mmBtu allowable emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- 1.c Emission Limitations: 0.44 lb CO/hr, 1.93 tons/yr CO

Applicable Compliance Method:

When combusting natural gas, the permittee may demonstrate compliance with the hourly allowable CO limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu. ft.

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 3.6 lbs CO/1000 gallons.

Compliance with the annual allowable CO limitation shall be ensured if compliance with the hourly allowable CO limitation is maintained (the annual allowable CO limitation was developed by multiplying the hourly allowable CO limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable CO limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

V. Testing Requirements (continued)

1.d Emission Limitations: 2.09 lbs NO_x/hr, 9.15 tons/yr NO_x

Applicable Compliance Method:

When combusting natural gas, the permittee may demonstrate compliance with the hourly allowable NO_x limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NO_x/mm cu. ft.

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable NO_x emission limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 21 lbs NO_x/1000 gallons.

Compliance with the annual allowable NO_x limitation shall be ensured if compliance with the hourly allowable NO_x limitation is maintained (the annual allowable NO_x limitation was developed by multiplying the hourly allowable NO_x limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7.

1.e Emission Limitation: 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitations shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Electrocoat Prime Coat and Ransburg Finish Paint System (K003)

Activity Description: Cathodic E-coat is applied to steel parts, which are dried in the Prime E-Coat Paint Oven. In the Reinforce Paint Booth, finish paint is applied to prime-coated steel parts in specific areas requiring additional finish paint coverage. Finish paint is then applied to reinforced, prime-coated steel parts by the Ransburg applicators. Parts coated with finish paint are dried in the Finish Paint Oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
large appliance coating line, with 7.1 mmBtu/hr prime e-coat curing oven, manual spray gun and booth (w/ water wall), rotary disk paint applicators (w/ fiberglass filters), and 7 mmBtu/hr finish paint curing oven	OAC rule 3745-21-09(K)(1)	exempt, pursuant to OAC rule 3745-21-09(K)(4) [See A.I.2.a.]
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.c.)

2. Additional Terms and Conditions

- 2.a This emissions unit was installed prior to October 19, 1979 and is located at the "Whirlpool Corporation (Findlay Division)." Therefore, in accordance with OAC rule 3745-21-09(K)(4), the provisions of OAC rule 3745-21-09(K)(1) are not applicable to this emissions unit as long as a "modification" to this emissions unit does not occur.
- 2.b The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.
- 2.c The emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: East Dishrack Powder Coating Line (K007)

Activity Description: Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
east dishrack powder coating line, with thermal incinerator and cyclonic wet scrubber	OAC rule 3745-21-09(K)(1)	4.5 lbs volatile organic compounds (VOC)/gallon of coating solids
	OAC rule 3745-17-11(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)
	40 CFR, Part 60, Subpart SS	See A.I.2.c.
	OAC rule 3745-31-05(A)(3) (PTI# 03-3658)	0.44 lb VOC/gallon of coating 0.024 lb particulate emissions (PE)/hr
		See A.I.2.d and A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(K)(1).

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.
- 2.b The emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-21-09(K)(1).
- 2.d The VOC emissions from this emissions unit shall be controlled through the use of a thermal incinerator with a minimum overall control efficiency of 80.2%, by weight, for VOCs.
- 2.e The permittee shall control all the PE from this emissions unit with a cyclonic wet scrubber.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The coatings usage in this emissions unit shall not exceed 185,598 gallons per rolling, 12-month period.
3. The pressure drop across the scrubber (in inches of water), while the emissions unit is in operation, shall be continuously maintained within the range established during the most recent emission test that demonstrated that the emissions unit was in compliance.
4. The pH of the scrubber liquor shall be maintained within the range of 6.5 to 8 while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the coating line and control equipment:

- a. The name and identification number of each coating, as applied.
 - b. The pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating.
 - c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings.
 - d. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using the maximum VOC content and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance.
 - e. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - f. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The VOC content, in pounds per gallon, of each coating employed.
 - d. The total number of gallons of all the coatings employed (summation of b for all coatings).
 - e. The rolling, 12-month summation of the monthly coatings usage rates.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall properly operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor and the pressure drop across the scrubber, in inches of water, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pH of the scrubber liquor, on a once/shift basis.
- b. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- c. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation of 4.5. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying coating [i.e., for VOC content (pounds of VOC per gallon of coating)] in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all exceedances of the rolling, 12-month coatings usage restriction of 185,598 gallons;
 - c. all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above; and
 - d. all periods of time during which the pressure drop across the scrubber did not comply with the pressure drop requirements specified above.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for the thermal incinerator of 80.2%, by weight, for VOCs, and shall include determinations of the capture efficiency and the thermal incinerator destruction efficiency.

V. Testing Requirements (continued)

- 1.c** The following test method(s) shall be employed to determine the overall control efficiency for the thermal incinerator. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency of the catalytic incinerator shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds between the inlet and outlet of the vapor control system.

The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- 1.d** The test(s) shall be conducted while this emissions unit and emissions unit K008 are operating at their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- 2.** During any emission testing for this emissions unit, the permittee shall record the following additional information:

- a. the combustion temperature within the thermal incinerator, as a 3-hour average, in degrees Fahrenheit;
- b. the pressure drop range for the scrubber, in inches of water; and
- c. the pH range for the scrubber liquor.

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

- 3.a** Emission Limitation: 4.5 lbs VOC/gallon coating solids

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating solids limitation above shall be based upon the record keeping required pursuant to Section A.III.1 of this permit.

- 3.b** Emission Limitation: 0.44 lb VOC/gallon of coating

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating limitation above shall be based upon the record keeping required pursuant to Section A.III.2 of this permit.

V. Testing Requirements (continued)

3.c Emission Limitation: 0.024 lb PE/hr

Applicable Compliance Method:

To calculate the worst case for PE, the permittee may use the following equation:

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

3.d Emission Limitation: 82.2% overall control efficiency for VOC

Applicable Compliance Method: The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with the methods and procedures specified in Section A.V.1 of this permit.

4. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1988. At that time, the emissions unit was not evaluated for the applicability of the New Source Performance Standards (NSPS) regulations. In addition, PTI #03-3658 erroneously cited OAC rule 3745-21-09(U) as being the applicable rule. However, the correct OAC rule citation should have been 3745-21-09(K). Therefore, as the initial step to allow this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PTI modification application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
east dishrack powder coating line with thermal incinerator and wet cyclonic scrubber	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this permit action as evaluated based on the actual materials (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: methyl ethyl ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 7.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.95
 AGLC (ug/m3): 14,047

- 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:
 - 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;
 - 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
 - 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.).

III. Monitoring and/or Record Keeping Requirements (continued)

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.

- 3.** 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":
 - 3.a** a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - 3.b** documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 3.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 - Terms and Conditions for Emissions Units

Emissions Unit ID: West Dishrack Powder Coating Line (K008)

Activity Description: Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
west dishrack powder coating line, with thermal incinerator and cyclonic wet scrubber	OAC rule 3745-21-09(K)(1)	4.5 lbs volatile organic compounds (VOC)/gallon of coating solids
	OAC rule 3745-17-11(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)
	40 CFR, Part 60, Subpart SS	See A.I.2.c.
	OAC rule 3745-31-05(A)(3) (PTI# 03-3658)	0.44 lb VOC/gallon of coating 0.024 lb particulate emissions (PE)/hr
		See A.I.2.d and A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(K)(1).

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.
- 2.b The emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-21-09(K)(1).
- 2.d The VOC emissions from this emissions unit shall be controlled through the use of a thermal incinerator with a minimum overall control efficiency of 80.2%, by weight, for VOCs.
- 2.e The permittee shall control all the PE from this emissions unit with a cyclonic wet scrubber.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The coatings usage in this emissions unit shall not exceed 185,598 gallons per rolling, 12-month period.
3. The pressure drop across the scrubber (in inches of water), while the emissions unit is in operation, shall be continuously maintained within the range established during the most recent emission test that demonstrated that the emissions unit was in compliance.
4. The pH of the scrubber liquor shall be maintained within the range of 6.5 to 8 while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the coating line and control equipment:

- a. The name and identification number of each coating, as applied.
 - b. The pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating.
 - c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings.
 - d. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using the maximum VOC content and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance.
 - e. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - f. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The VOC content, in pounds per gallon, of each coating employed.
 - d. The total number of gallons of all the coatings employed (summation of b for all coatings).
 - e. The rolling, 12-month summation of the monthly coatings usage rates.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall properly operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor and the pressure drop across the scrubber, in inches of water, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pH of the scrubber liquor, on a once/shift basis.
- b. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- c. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation of 4.5. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying coating [i.e., for VOC content (pounds of VOC per gallon of coating)] in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all exceedances of the rolling, 12-month coatings usage restriction of 185,598 gallons;
 - c. all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above; and
 - d. all periods of time during which the pressure drop across the scrubber did not comply with the pressure drop requirements specified above.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for the thermal incinerator of 80.2%, by weight, for VOCs, and shall include determinations of the capture efficiency and the thermal incinerator destruction efficiency.

V. Testing Requirements (continued)

- 1.c** The following test method(s) shall be employed to determine the overall control efficiency for the thermal incinerator. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency of the catalytic incinerator shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds between the inlet and outlet of the vapor control system.

The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- 1.d** The test(s) shall be conducted while this emissions unit and emissions unit K008 are operating at their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- 2.** During any emission testing for this emissions unit, the permittee shall record the following additional information:

- a. the combustion temperature within the thermal incinerator, as a 3-hour average, in degrees Fahrenheit;
- b. the pressure drop range for the scrubber, in inches of water; and
- c. the pH range for the scrubber liquor.

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

- 3.a** Emission Limitation: 4.5 lbs VOC/gallon coating solids

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating solids limitation above shall be based upon the record keeping required pursuant to Section A.III.1 of this permit.

- 3.b** Emission Limitation: 0.44 lb VOC/gallon of coating

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating limitation above shall be based upon the record keeping required pursuant to Section A.III.2 of this permit.

V. Testing Requirements (continued)

3.c Emission Limitation: 0.024 lb PE/hr

Applicable Compliance Method:

To calculate the worst case for PE, the permittee may use the following equation:

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

3.d Emission Limitation: 82.2% overall control efficiency for VOC

Applicable Compliance Method: The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with the methods and procedures specified in Section A.V.1 of this permit.

4. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1988. At that time, the emissions unit was not evaluated for the applicability of the New Source Performance Standards (NSPS) regulations. In addition, PTI #03-3658 erroneously cited OAC rule 3745-21-09(U) as being the applicable rule. However, the correct OAC rule citation should have been 3745-21-09(K). Therefore, as the initial step to allow this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PTI modification application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
west dishrack powder coating line with thermal incinerator and wet cyclonic scrubber	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this permit action as evaluated based on the actual materials (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: methyl ethyl ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 7.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.95
 AGLC (ug/m3): 14,047

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 still 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:
 - 2.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;
 - 2.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
 - 2.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.).

III. Monitoring and/or Record Keeping Requirements (continued)

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.

- 3.** 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:"
 - 3.a** a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - 3.b** documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 3.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

THIS IS THE LAST PAGE OF THE PERMIT
