

Automatic Feed Company  
Application No. 03-13017  
Henry County

### **Additional Special Terms and Conditions**

INTRODUCTION: Automatic Feed company submitted permit to install (PTI) application 03-13017 for the modification of Paint Spray Booth, Ohio EPA emissions unit K002. The modification resulted from an increased production demand and a change in the coatings employed in emissions unit K002. As a result of the increased production demand, the company is also requesting a coating usage rate in excess of 10 gallons per day, as established in permit to install application 03-10543. The company will now employ extreme performance coatings that are capable of enduring outdoor weather and are dried at temperatures less than 200 degrees Fahrenheit. All hazardous air pollutant emissions are under one ton per year. Therefore, no modeling is needed.

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

None

#### **B. Operational Restrictions**

1. The hourly VOC limit is based on the emissions unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this emissions limit.

#### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - (a) the name and identification number of each coating, as applied; and
  - (b) the VOC content of each coating (excluding water and exempt solvents), as applied, in pounds of VOC per gallon of solids.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - (a) the name and identification of each cleanup material employed;

- (b) the VOC content of each cleanup material, in pounds per gallon;
  - (c) the number of gallons of each cleanup material employed;
  - (d) the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - (e) the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. These daily records, as well as any supporting coating analysis computations, shall be maintained in the company's files at the facility for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

**D. Reporting Requirements**

- 1. 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 noncomplying coatings. 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 30 days following the end of the calendar month.
- 2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

- 1. Compliance with the emission limitations contained in this permit to install shall be determined in accordance with the following methods:
  - (a) Emission Limitation:  
6.1 lbs VOC/hour and 10.1 tons VOC/year  
  
Applicable Compliance Method:  
Compliance with the annual VOC limit shall be based upon the recordkeeping requirements specified in Section(C)(1) and (2), and reporting requirements specified in Section (D)(2).
  - (b) Emission Limitation:  
0.55 lbs PE/hour and 2.4 tons PE/year

Applicable Compliance Method:

As long as the represented maximum hourly coating application rate is not exceeded and the control equipment for particulate emissions (dry exhaust filter) is operating properly and in accordance with the manufacturer's specifications, compliance with the respective particulate emission limits of 0.55 lb/hr and 2.4 tons/year will be assumed to be maintained.

However, to determine the actual worst case emissions rate for particulate matter, the following equation shall be used:

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

E = particulate emissions rate, in pounds per hour

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

- (c) Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

Compliance with visible emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).

- (d) Emission Limitation:  
Cleanup materials: 67.1 lbs VOC/month and 0.40 tons

VOC/year

Applicable Compliance Method:

Compliance with the VOC emissions from cleanup materials

shall

be based upon the recordkeeping requirements specified in

Section

(C)(2) and reporting requirements specified in Section (D)(2).

2. Any determination of VOC content (VOC content means all the volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon excluding water and exempt solvents), solids content, or density or coating material shall be based on the coating

materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The company shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

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

**F. Miscellaneous Requirements**

None