Facility ID: 0679000129 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0679000129 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - DTC-PLD epoxy dip station, consisting of a vent hood over a dip pan and flashoff rack, followed by an oven	OAC rule 3745-31-05(A)(3) PTI # 06-08107, issued 3/28/06	Emissions of organic compounds (OC) shall not exceed 65.9 pounds per day nor 12.1 tons per year.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See B.1 below.

2. **Additional Terms and Conditions**

   (a) None

B. **Operational Restrictions**

1. This emissions unit shall not employ more than 10 gallons of coating on metal parts in any given day.

   If this emissions unit ever employs more than 10 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09 (U)(1)(c), and the 10 gallons per day limitation will no longer be applicable.

C. **Monitoring and/or Record Keeping Requirements**

1. RECORD KEEPING REQUIREMENTS FOR COATING SUBJECT TO THE 10 GALLONS OF COATING/DAY LIMITATION

   NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 10 gallons of coating in any given day. If any record shows that this emissions unit employs more than 10 gallons of coating in any given day, thereafter, the record keeping requirements contained in Section C.2 of this permit shall apply and the 10 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

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

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. RECORD KEEPING REQUIREMENTS FOR COATING SUBJECT TO THE VOC CONTENT LIMITATION

   NOTE: The record keeping requirements contained in this part shall only apply if the 10 gallons per day limitation has been exceeded.

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

   a. The name and identification number of each coating, as applied.

   b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

   c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the

equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

3. The permittee shall collect and record the following information for each day for the coating operation:

   a. The company identification for each coating and cleanup material employed.

   b. The number of gallons of each coating and cleanup material employed.

   c. The OC content of each coating and cleanup material, in pounds per gallon.

   d. The total OC emission rate for all coatings and cleanup materials, in pounds per day.

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall record the total annual OC emission rate for all coatings and cleanup materials, in tons, calculated as the summation of 3.d, above, for all days in the calendar year divided by 2000 lb/ton.

5. The permit to install for emissions units R001 - R003 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: methyl ethyl ketone (MEK)
   TLV (mg/m3): 590
   Maximum Hourly Emission Rate (lbs/hr): 8.11 (for R001 - R003 combined)
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13,000
   MAGLC (ug/m3): 14,000

6. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs, Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices";

   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.).

7. 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) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. REPORTING REQUIREMENTS FOR COATING SUBJECT TO THE 10 GALLONS OF COATING/DAY LIMITATION

   NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 10 gallons of coating in any given day. If any record shows that this emissions unit employs more than 10 gallons of coating in any given day, thereafter, the reporting requirements contained in Section D.2 of this permit shall apply and the 10 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

   The permittee shall notify the Southeast District Office in writing of any daily record showing that the coating line employs more than the maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

2. REPORTING REQUIREMENTS FOR COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the 10 gallons per day limitation has been exceeded.

The permittee shall notify the Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

3. The permittee shall notify the Southeast District Office in writing of any daily record showing that the total OC emissions exceeded the maximum daily emission limit. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

4. The permittee shall notify the Southeast District Office in writing of any daily record showing that the total annual OC emissions exceeded the annual emission limit. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

E. **Testing Requirements**

1. Compliance with the requirements of Section A.1. and B.1. of these terms and conditions shall be determined in accordance with the following methods:
Operational Restriction:

This emissions unit shall not employ more than 10 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.
Emission Limitation:

Emissions of OC shall not exceed 65.9 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3 of this permit.
Emission Limitation:

Emissions of OC shall not exceed 12.1 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.4 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

3. If the 10 gallon per day coating usage limit is ever exceeded, compliance with the coating limitation of 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average shall be based upon the record keeping specified in Section C.2 of this permit.

F. **Miscellaneous Requirements**

1. None