

Facility ID: 0679000200 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: 0679000200 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Two electrostatic paint chambers and curing oven	OAC rule 3745-31-05(A)(3) (PTI 06-07553)	<p>Volatile organic compounds (VOC) emissions from coating operations shall not exceed 22.5 pounds per hour.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i) and OAC rule 3745-35-07(B).</p> <p>VOC emissions from coating operations shall not exceed 31.5 tons in any rolling, 12-month period.</p> <p>VOC emissions from cleanup operations shall not exceed 7.9 tons in any rolling, 12-month period.</p> <p>Emissions of total hazardous air pollutant (HAP) from this facility shall not exceed 12.1 tons per rolling, 12-month period.</p> <p>Emissions of any individual HAP from this facility shall not exceed 9.4 tons per rolling, 12-month period.</p> <p>See section B.1.</p>
	OAC rule 3745-35-07(B)	
	OAC rule 3745-21-09(U)(1)(i)	<p>The VOC content of coatings shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.</p>

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. The permittee shall not employ more than 1200 gallons of cleanup solvents which contain HAP in any rolling, 12-month period.

NOTE: The number of gallons of cleanup material employed is the difference between the gallons of cleanup material received and the gallons of cleanup material shipped off site.
2. The permittee shall not employ more than 21,000 gallons of coating in any rolling, 12-month period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

- c. the VOC content, as applied, of each coating and cleanup material employed, in pounds per gallon;
 - d. each individual HAP and total HAP content, of each coating and cleanup material employed, in pounds per gallon;
 - e. the total VOC emissions from all cleanup materials employed [the sum of (b. times c.), for all cleanup materials], in pounds or tons;
 - f. the total VOC emissions from all coatings employed [the sum of (b. times c.), for all coatings], in pounds or tons;
 - g. the monthly emissions of each individual HAP and total HAP [the sum of (b. times d.)], in pounds or tons;
 - h. the updated rolling, 12-month summation for individual HAP emissions, for each HAP, for the current month and the preceding eleven calendar months, in pounds or tons;
 - i. the updated rolling, 12-month summation for total combined HAP emissions for the current month and the preceding eleven calendar months, in pounds or tons;
 - j. the total number of gallons of coatings employed in the previous 12 months; and
 - k. the total number of gallons of cleanup solvents which contain HAP employed in the previous 12 months.

The permittee has sufficient monthly records of coatings and cleanup materials usage to begin calculating the rolling, 12-month summations upon final issuance of this permit.

- 2. The permit to install for this emissions unit [R001] 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: xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 4.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 448.4

MAGLC (ug/m3): 10,338

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.).
- 3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) 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. The permittee shall notify the Ohio EPA, Southeast District Office in writing of any monthly record showing the use of a coating which exceeds the VOC content limit of 3.0 pounds per gallon of coating, excluding water and

exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly reports that include the following information:
 - a. the total emissions of VOC from all coatings, in tons, during each calendar month and each rolling, 12-month period;
 - b. the total emissions of VOC from all cleanup materials, in tons, during each calendar month and each rolling, 12-month period;
 - c. the total emissions of each individual and total HAP from the facility, in tons, during each calendar month and each rolling, 12-month period;
 - d. the total number of gallons of coating employed during each calendar month and each rolling, 12-month period; and
 - e. the total number of gallons of cleanup solvents which contain HAP employed during each calendar month and each rolling, 12-month period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include information for each month during the previous calendar quarter.

E. Testing Requirements

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

Volatile organic compounds (VOC) emissions from coating operations shall not exceed 22.5 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based on the maximum capacity of the spraying equipment (7.5 gallons per hour) while using coatings that comply with the VOC content limitation (3.0 pounds VOC per gallon of coating, excluding water and exempt solvents).

Emission Limitation:

VOC content of coatings shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

Emission Limitation:

VOC emissions from coating operations shall not exceed 31.5 tons in any rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C. This limit was based on the maximum allowable annual production capacity (21,000 gallons per year of coating) while using coatings that comply with the VOC content limitation (3.0 pounds VOC per gallon of coating, excluding water and exempt solvents).

Emission Limitation:

VOC emissions from cleanup operations shall not exceed 7.9 tons in any rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials. This limit was based on the permittee's application which showed the following maximum usage rates:

$(1200 \text{ gal/yr xylene/ethyl benzene})(7.26 \text{ lb/gal}) + (800 \text{ gal/yr propylene glycol})(8.64 \text{ lb/gal}) = 15,624 \text{ lb/yr} = 7.82 \text{ tpy}$

Emission Limitation:

Emissions of total hazardous air pollutant (HAP) from the facility shall not exceed 12.1 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C. This limit was based on the permittee's application which showed the following maximum usage rates:

$(1200 \text{ gal/yr xylene/ethyl benzene})(7.26 \text{ lb/gal})(100\% \text{ HAP}) + (21,000 \text{ gal/yr coating})(0.733 \text{ lb HAP/gal}) = 24,105 \text{ lb/yr} = 12.06 \text{ tpy}$

Emission Limitation:

Emissions of any individual HAP from the facility shall not exceed 9.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C. This limit was based on the permittee's application which showed the following maximum usage rates:

$$(1200 \text{ gal/yr xylene/ethyl benzene})(7.26 \text{ lb/gal})(81\% \text{ xylene}) + (21,000 \text{ gal/yr coating})(0.552 \text{ lb xylene/gal}) = 18,649 \text{ lb/yr} = 9.33 \text{ tpy}$$

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), all the terms and conditions of this permit are federally enforceable. The applicant has requested the restrictions in this permit to limit the potential to emit and, therefore, avoid Title V applicability.