

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: P001 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>
Solvent reclaimer	OAC rule 3745-31-05(A)(3) (PTI 06-07294)	<p>Volatile organic compounds (VOC) emissions shall not exceed 25.2 pounds per day and 4.6 tons per year.</p> <p>See section A.2.a.</p>
	OAC rule 3745-35-07(B)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).</p> <p>Total hazardous air pollutant (HAP) emissions from this facility shall not exceed 8.0 tons per rolling, 12-month period.</p>
	OAC rule 3745-21-07(G)(2)	<p>See sections B.1 and B.2.</p> <p>The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- (a) This emissions unit only processes used cleanup solvent associated with the coating operations at the facility (R001). The permit for emissions unit R001 limits the amount of cleanup material employed to 2000 gallons per rolling, 12-month period and includes the definition: "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." Therefore, all emissions from the solvent reclaimer will be included in the cleanup emissions in emissions unit R001. Emissions unit R001 contains a synthetic minor limit to avoid Title V. Those same requirements are included in this permit also.

B. Operational Restrictions

1. The permittee shall not employ more than 2000 gallons per rolling, 12-month period for cleanup.

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 process more than one batch per day through the reclaimer.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the cleanup activities at the facility:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the total HAP content of each cleanup material, in pounds per gallon; and
 - d. the total emissions of HAP from all cleanup materials employed [the sum of (b. times c.) for all cleanup materials], in pounds or tons.
2. The permittee shall collect and record the following information each month:

- a. the total emissions of HAP from the facility in the previous 12 months, in tons; and
 - b. the total number of gallons of cleanup material employed in the previous 12 months.
3. For each day during which the permittee processes more than one batch per day through the reclaimer, the permittee shall maintain a record of the number of batches processed during that day.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that include the following information:
- a. the total emissions of HAP from the facility, in tons, during each calendar month and each rolling, 12-month period; and
 - b. the total number of gallons of cleanup material 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.
2. The permittee shall submit deviation (excursion) reports that identify each day when more than one batch of solvent was processed through the reclaimer. Each report shall be submitted within 30 days after the deviation occurs.

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:
- VOC emissions shall not exceed 25.2 pounds per day.
- Applicable Compliance Method:
- Compliance shall be demonstrated by the following calculation. The VOC emission factor was provided by the permittee and is based on an emission test performed at maximum reclaimer capacity.
- $$(3.5 \text{ gal. solvent emissions/batch})(7.2 \text{ lb/gal. solvent})(1 \text{ batch/day}) = 25.2 \text{ lbs/day}$$
- Emission Limitation:
- VOC emissions from coating operations shall not exceed 4.6 tons per year.
- Applicable Compliance Method:
- The tpy emission limitation was developed by multiplying the short-term daily allowable VOC emission limitation (25.2 lbs/day) by the maximum annual days of operation (365 days), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.
- $$[(25.2 \text{ lbs/day})(365 \text{ day/yr}) / 2000 \text{ lbs/ton}] = 4.6 \text{ tpy}$$
- Emission Limitation:
- Total HAP emissions from this facility shall not exceed 8.0 tons per rolling, 12-month period.
- Applicable Compliance Method:
- Compliance shall be demonstrated 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 and cleanup materials.
- Operational Restrictions:
- The permittee shall not employ more than 2000 gallons per rolling, 12-month period for cleanup.
- The permittee shall not process more than one batch per day through the reclaimer.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section C.

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.