

Facility ID: 0679000295 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: 0679000295 Emissions Unit ID: R002 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>
spray booth # 2 for top coating wood furniture	OAC rule 3745-31-05(A)(3) (PTI 06-6023)	Emissions of organic compounds (OC) shall not exceed 9.25 lbs/hr on any day during which no photochemically reactive materials (PRM) (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.
	OAC rule 3745-21-07(G)(2)	Combined emissions of OC from emissions units R001 and R002 shall not exceed 31.5 tons during any 12-month period.
	OAC rule 3745-17-07(A)	Emissions of OC shall not exceed 8 lbs/hr and 40 lbs/day on any day during which PRM are employed in this emissions unit.
	OAC rule 3745-17-11	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. Particulate emissions shall not exceed 0.551 lb/hr and 2.41 tpy.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. Combined coating usage in emissions units R001 and R002 shall not exceed 10,000 gallons during any 12-month period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material contains PMR and identification of each day during which any coating or cleanup material containing PMR is employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total OC emissions rate for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly OC emissions rate for all coatings and cleanup materials (i.e., (e)/(f), in pounds per hour (average)).

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

2. The permittee shall collect and record the following information each month for the coating line:
 - a. the total number of gallons of all coatings and cleanup materials employed in emissions units R001 and R002, combined;
 - b. the total OC emission rate for all coatings and cleanup materials employed in emissions units R001 and R002, combined;
 - c. the total OC emission rate for all coatings and cleanup materials employed in emissions units R001 and R002, combined, for the previous 12-month period; and
 - d. the total combined coating usage for emissions units R001 and R002 in each 12-month period.

3. 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: Butanol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lb/hr): 0.925

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 186

MAGLC (ug/m3): 3,619

Pollutant: Stoddard solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 4.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 763

MAGLC (ug/m3): 12,500

4. 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.).

5. 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 submit deviation (excursion) reports to the Ohio EPA, Southeast District Office that include the following information:

- a. an identification of each day during which the average hourly OC emission rate (on any day during which any coating or cleanup material containing PRM is employed) exceeded 8 lbs/hr, and the actual average hourly OC emission rate for each such day;
- b. an identification of each day during which the OC emission rate (on any day during which any coating or cleanup material containing PRM is employed) exceeded 40 lbs/day, and the actual OC emission rate for each such day;
- c. an identification of each day during which the average hourly OC emission rate (on any day during which no coating or cleanup material containing PRM is employed) exceeded 9.25 lbs/hr, and the actual average hourly OC emission rate for each such day;
- d. an identification of each month during which the total OC emission rate for all coatings and cleanup materials employed in emissions units R001 and R002, combined, for the previous 12-month period exceeded 31.5 tons, and the actual OC emission rate for that 12-month period; and
- e. an identification of each month during which the total coating usage rate for all coatings and cleanup materials employed in emissions units R001 and R002, combined, for the previous 12-month period exceeded 10,000 gallons, and the actual coating usage for that 12-month period.

E. Testing Requirements

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

9.25 lbs/hr of OC on any day when no PRM is used

31.5 tpy of OC combined emissions from emissions units R001 and R002

8 lbs/hr OC on any day when PRM is used

40 lbs/day OC on any day when PRM is used

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(3) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage 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 more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

Particulate emissions shall not exceed 2.41 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), 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.

Operational Restriction:

Combined coating usage in emissions units R001 and R002 shall not exceed 10,000 gallons during any 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on record keeping requirements specified in section C of these terms and conditions.

F. **Miscellaneous Requirements**

1. None