



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

02/23/01

**CERTIFIED MAIL**

02-38-00-0161

**RE: Final Chapter 3745-35 Permit To Operate**

Wastequip Accurate of Ohio  
Larry Mohler  
930 Massillon Road  
Millersburg, OH 44654

Dear Larry Mohler:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact the Northeast District Office at (330) 425-9171

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Northeast District Office  
Jim Orlemann, DAPC Engineering  
Becky Castle, DAPC PMU

## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 02/23/01

Facility ID: 02-38-00-0161

Expiration Date: 02/23/06

**FINAL ISSUE**

This document constitutes issuance for:

Wastequip Accurate of Ohio  
Accurate Industries, Inc.  
930 Massillon Road  
Millersburg, OH 44654

of a permit to operate for:

K001 (Paint Booth #1)  
Paint booth used for surface coating of steel refuse containers

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

**5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

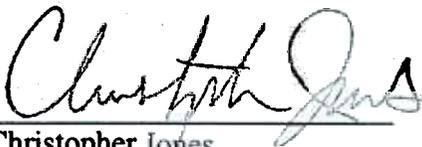
**10. The permittee is also subject to the attached special terms and conditions.**

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

**OHIO ENVIRONMENTAL PROTECTION AGENCY**



**Christopher Jones**  
Director

**Part II: Special Terms and Conditions**

**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>
K001 paint spray booth for misc. metal parts equipped with dry filters and electrostatic spray equipment (two guns)	OAC rule 3745-31-05(A)(3) PTI # 02-9610	VOC emissions shall not exceed 30.0 TPY
	OAC rule 3745-21-09 (U)(1)(d)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit
	OAC rule 3745-35-07(B)	See section A.2.a. of these terms and conditions.

**2. Additional Terms and Conditions**

- 2.a Total emissions from emissions units K001 and K002 shall not exceed the following limits:
  - i. 9.9 tons per year of each single hazardous air pollutant (HAP), based upon a rolling 12-month summation.
  - ii. 24.9 tons per year of total combined hazardous air pollutants (HAPs), based upon a rolling 12-month summation.

**B. Operational Restrictions**

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The maximum annual coating usage in this emissions unit shall not exceed 16,857 gallons, as applied.

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

1. The permittee shall keep the following monthly records to ensure compliance with the VOC and HAP emission limits:

**C. Monitoring and/or Record Keeping Requirements (continued)**

**1.a** For each coating and cleanup material used in this emissions unit:

the name and identification number of each coating and cleanup material employed;

the amount of each coating used, "CT", in gallons per month;

iii. the amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

iv. the VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating applied (PVGC), in pounds per gallon of coating excluding water and exempt solvents, and in pounds of VOC per gallon of cleanup material used (PVGCM);

v. the content of each single HAP (HAPC) in each coating and each cleanup material, in pounds of each single HAP per gallon of each coating and each cleanup material;

vi. for each coating, the amount of VOC emitted, in pounds per month, to be defined as "CVOC" and calculated as follows:

$$CVOC = CT * PVGC$$

vii. for each cleanup material, the amount of VOC emitted, in pounds per month, to be defined as "CMVOC" and calculated as follows:

$$CMVOC = CM * PVGCM$$

viii. the total monthly emissions of a single HAP from each coating, "(PUDH)<sub>i</sub>", in pounds, where

$$PUDH_i = CT * HAPC$$

i = subscript denoting an individual coating; and

n = the total number of different coatings employed that contain the HAP; and

ix. the total monthly emissions of a single HAP from each cleanup material, "(PDCM)<sub>i</sub>", in pounds, where

$$PDCM_i = CM * HAPC$$

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed that contain the HAP.

**1.b** The total amount of VOC emitted (TVOC) from this emissions unit, in tons per month, i.e., the total coating VOC (TDV) plus total cleanup material VOC (TCMVOC), divided by 2000 pounds per ton, and represented by the following equation:

$$TVOC = (TDV + TCMVOC) / (2000 \text{ lbs/ton})$$

where

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from i = 1 to i = n, of (CVOC)<sub>i</sub>, where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

and

TCMVOC = total monthly emissions of VOC from all cleanup materials employed, in pounds, calculated according to the following equation:

TCMVOC = the sum, from i = 1 to i = n, of (CMVOC)<sub>i</sub>, where

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed.

**C. Monitoring and/or Record Keeping Requirements (continued)**

- 1.c** For each single HAP, the total amount of that HAP emitted (TSHAP) from this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP) plus total cleanup material HAP (TPDCM), divided by 2000 pounds per ton, and represented by the following equation:

$$\text{TSHAP} = (\text{SHAP} + \text{TPDCM}) / (2000 \text{ lbs/ton})$$

where

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from  $i = 1$  to  $i = n$  of (PUDH)<sub>i</sub>

and

TPDCM = total monthly emissions for a single HAP in cleanup material, in pounds calculated according to the following equation:

TPDCM = the sum, from  $i = 1$  to  $i = n$ , of (PDCM)<sub>i</sub>

- 1.d** The total amount of combined HAPs emitted (TCHAP) from this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and represented by the following equation:

$$\text{TCHAP} = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (\text{TSHAP})_i,$$

where

TSHAP = total monthly emissions for a single HAP from all coatings and clean-up material, in tons per month, calculated according to the equations in C.1.c.

$i$  = subscript denoting each single HAP; and

$n$  = the total number of different single HAPs.

- 1.e** The rolling, 12-month summation of the emissions of each single HAP from emissions units K001 and K002.
- 1.f** The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units K001 and K002.
- 2.** The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

- 2.a** Pollutant: Butyl Cellosolve  
TLV (ug/m3): 25

Maximum Hourly Emission Rate (lbs/hr): 1.34

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.15

MAGLC (ug/m3): 0.60

- 2.b** Pollutant: Methyl Isobutyl Ketone  
TLV (ug/m3): 50

Maximum Hourly Emission Rate (lbs/hr): 2.19

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.03

MAGLC (ug/m3): 1.19

**C. Monitoring and/or Record Keeping Requirements (continued)**

**2.c** Pollutant: Methyl Amyl Ketone  
TLV (ug/m3): 50

Maximum Hourly Emission Rate (lbs/hr): 2.01

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.023

MAGLC (ug/m3): 1.19

**2.d** 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

**2.e** 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 its 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.

**3.** The permittee shall maintain daily records that document any time periods when the dry filters were not in service when the emissions unit was in operation.

**4.** The permittee shall record annually the following information for emissions unit K001:

a. the total coating usage (gallons); and

b. the total VOC emissions (tons), based on a summation of the monthly records in Section C.1.b.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each month during which the VOC content of any coating employed exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents, and the actual VOC content of each such coating employed;
  - b. all exceedances of the rolling, 12-month emission limitation for each single HAP; and
  - c. all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the following information:
  - a. the emissions of VOC from this emissions unit and from emissions units K001 and K002 combined;
  - b. the total emissions of each single HAP from this emissions unit and from emissions units K001 and K002 combined;
  - c. the total emissions of total combined HAPs from this emissions unit and from emissions units K001 and K002 combined; and
  - d. the total annual coating usage.

The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event 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:
  - 1.a Emission Limitation:  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.  
  
Applicable Compliance Method:  
Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and inks.
  - 1.b Emission Limitation:  
30.0 tons per year of VOC emission from K002  
  
Compliance determination:  
Compliance shall be based upon the record keeping specified in C.1.a, C.1.b. and C.4. of these terms and conditions.
2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 2.a Emission Limitation:  
9.90 tons per year of each single HAP, based upon a rolling 12-month summation for K001 and K002.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Sections C.1.a, C.1.c and C.1.e of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**E. Testing Requirements (continued)**

- 2.b** Emission Limitation:  
24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for K001 and K002.

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping specified in Sections C.1.d. and C.1.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to operate are federally enforceable: A - F.

## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 02/23/01

Facility ID: 02-38-00-0161

Expiration Date: 02/23/06

**FINAL ISSUE**

This document constitutes issuance for:

Wastequip Accurate of Ohio  
Accurate Industries, Inc.  
930 Massillon Road  
Millersburg, OH 44654

of a permit to operate for:

K002 (Paint Booth #2)  
Paint booth used in the surface coating of steel refuse containers

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

#### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### **6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

#### **7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

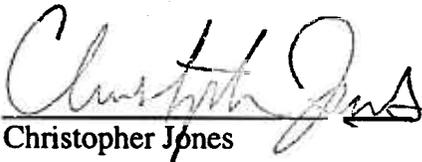
**10. The permittee is also subject to the attached special terms and conditions.**

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

A handwritten signature in cursive script, appearing to read "Christopher Jones", written in black ink. The signature is positioned above the printed name and title.

Christopher Jones  
Director

## Part II: Special Terms and Conditions

### 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>
K002 paint spray booth for misc. metal parts equipped with dry filters and electrostatic spray equipment (two guns)	OAC rule 3745-31-05(A)(3) PTI # 02-12792	VOC emissions shall not exceed 49.0 TPY
	OAC rule 3745-21-09 (U)(1)(d)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit
	OAC rule 3745-35-07(B)	See section A.2.a. of these terms and conditions.

### 2. Additional Terms and Conditions

- 2.a Total emissions from emissions units K001 and K002 shall not exceed the following limits:
  - i. 9.9 tons per year of each single hazardous air pollutant (HAP), based upon a rolling 12-month summation.
  - ii. 24.9 tons per year of total combined hazardous air pollutants (HAPs), based upon a rolling 12-month summation

### B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The maximum annual coating usage in this emissions unit shall not exceed 27,400 gallons, as applied.

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

1. The permittee shall keep the following monthly records to ensure compliance with the VOC and HAP emission limits:

**C. Monitoring and/or Record Keeping Requirements (continued)**

**1.a** For each coating and cleanup material used in this emissions unit:

the name and identification number of each coating and cleanup material employed;

the amount of each coating used, "CT", in gallons per month;

iii. the amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;

iv. the VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating applied (PVGC), in pounds per gallon of coating excluding water and exempt solvents, and in pounds of VOC per gallon of cleanup material used (PVGCM);

v. the content of each single HAP (HAPC) in each coating and each cleanup material, in pounds of each single HAP per gallon of each coating and each cleanup material;

vi. for each coating, the amount of VOC emitted, in pounds per month, to be defined as "CVOC" and calculated as follows:

$$CVOC = CT * PVGC$$

vii. for each cleanup material, the amount of VOC emitted, in pounds per month, to be defined as "CMVOC" and calculated as follows:

$$CMVOC = CM * PVGCM$$

viii. the total monthly emissions of a single HAP from each coating, "(PUDH)<sub>i</sub>", in pounds, where  $PUDH_i = CT * HAPC$

i = subscript denoting an individual coating; and

n = the total number of different coatings employed that contain the HAP; and

ix. the total monthly emissions of a single HAP from each cleanup material, "(PDCM)<sub>i</sub>", in pounds, where  $PDCM_i = CM * HAPC$

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed that contain the HAP.

**1.b** The total amount of VOC emitted (TVOC) from this emissions unit, in tons per month, i.e., the total coating VOC (TDV) plus total cleanup material VOC (TCMVOC), divided by 2000 pounds per ton, and represented by the following equation:

$$TVOC = (TDV + TCMVOC) / (2000 \text{ lbs/ton})$$

where

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from  $i = 1$  to  $i = n$ , of  $(CVOC)_i$ , where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

and

TCMVOC = total monthly emissions of VOC from all cleanup materials employed, in pounds, calculated according to the following equation:

TCMVOC = the sum, from  $i = 1$  to  $i = n$ , of  $(CMVOC)_i$ , where

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed.

**C. Monitoring and/or Record Keeping Requirements (continued)**

- 1.c** For each single HAP, the total amount of that HAP emitted (TSHAP) from this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP) plus total cleanup material HAP (TPDCM), divided by 2000 pounds per ton, and represented by the following equation:

$$TSHAP = (SHAP + TPDCM) / (2000 \text{ lbs/ton})$$

where

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from  $i = 1$  to  $i = n$  of (PUDH)<sub>i</sub>,

and

TPDCM = total monthly emissions for a single HAP in cleanup material, in pounds calculated according to the following equation:

TPDCM = the sum, from  $i = 1$  to  $i = n$ , of (PDCM)<sub>i</sub>

- 1.d** The total amount of combined HAPs emitted (TCHAP) from this emissions unit, in tons per month, i.e., the sum of the total amount of each HAP emitted from this emissions unit (TSHAP), and represented by the following equation:

$$TCHAP = \text{the sum, } i = 1 \text{ to } i = n, \text{ of } (TSHAP)_i$$

where

TSHAP = total monthly emissions for a single HAP from all coatings and clean-up material, in tons per month, calculated according to the equations in C.1.c.

- 1.e** The rolling, 12-month summation of the emissions of each HAP from emissions units K001 and K002.

- 1.f** The rolling, 12-month summation of the emissions of total, combined HAPs from emissions unit K001 and K002.

- 2.** The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

- 2.a** Pollutant: Xylene  
TLV (ug/m3):434000

Maximum Hourly Emission Rate (lbs/hr):1.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):78.91

MAGLC (ug/m3): 10300

- 2.b** Pollutant: Methyl Isobutyl Ketone

TLV (ug/m3):205,000

Maximum Hourly Emission Rate (lbs/hr):1.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 88.93

MAGLC (ug/m3): 48,880

**C. Monitoring and/or Record Keeping Requirements (continued)**

**2.c** Pollutant: 2-Butoxyethanol

TLV (ug/m3):121,000

Maximum Hourly Emission Rate (lbs/hr):0.934

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 47.27

MAGLC (ug/m3): 2,880

**2.d** 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

**2.e** 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 its 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.

**3.** The permittee shall maintain daily records that document any time periods when the dry filters were not in service when the emissions unit was in operation.

**4.** The permittee shall record annually the following information for emissions unit K002:

- a. the total coating usage (gallons); and
- b. the total VOC emissions (tons), based on a summation of the monthly records in Section C.1.b.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each month during which the VOC content of any coating employed exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents, and the actual VOC content of each such coating employed;
  - b. all exceedances of the rolling, 12-month emission limitation for each single HAP;
  - c. all exceedances of the rolling, 12-month emission limitation for total combined HAPs. The permittee shall submit deviation (excursion) reports which include the following information:
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize the following information:
  - a. emissions of VOC from this emissions unit and from emissions units K001 and K002 combined;
  - b. the total emissions of each single HAP from this emissions unit and from emissions units K001 and K002 combined;
  - c. the total emissions of total combined HAPs from this emissions unit and from emissions unit K001 and K002 combined; and
  - d. the total annual coating usage.

The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the dry filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Northeast District Office) within 30 days after the event 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:
  - 1.a Emission Limitation:  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.  
  
Applicable Compliance Method:  
Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and inks.
  - 1.b Emission Limitation:  
49.0 tons per year of VOC emission from K002  
  
Compliance determination:  
Compliance shall be based upon the record keeping specified in C.1.a, C.1.b. and C.4. of these terms and conditions.
2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

**E. Testing Requirements (continued)**

- 2.a** Emission Limitation:  
9.90 tons per year of each single HAP, based upon a rolling 12-month summation for K001 and K002.

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping specified in Sections C.1.a, C.1.c and C.1.e of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

- 2.b** Emission Limitation:  
24.9 tons per year of total, combined HAP, based upon a rolling 12-month summation for K001 and K002.

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping specified in Sections C.1.d. and C.1.f. of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to operate are federally enforceable: A - F.