

Facility ID: 0679010301 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: 0679010301 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>
Wood Moldings Coating Line	OAC 3745-31-05 See F.1.	Emissions of volatile organic compounds (VOC) shall not exceed 16.5 pounds per hour and 31.5 tons per year.
	OAC 3745-17-11	See Section 2 below. Emissions of particulate matter shall not exceed 0.551 pound per hour.
	OAC 3745-17-07	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- (a) In conjunction with the best available technology requirements of OAC rule 3745-31-05, the butyl acetate and methanol emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Butyl Acetate

TLV (ug/m3): 713,000
 Maximum Hourly Emission Rate (lbs/hr): 5.775
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 3880
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16976

Pollutant: Methanol

TLV (ug/m3): 262,000
 Maximum Hourly Emission Rate (lbs/hr): 1.485
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 998
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 6238
 Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 06-5335 and the operating permit:

- i. Any changes in the composition of the coatings, thinners, or cleanup materials, or the use of new coatings, thinners, or cleanup 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 specified in the above table.
- ii. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

iii. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

iv. Any change in the composition of the coatings, thinners, or cleanup materials, or use of new coatings, thinners, or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

v. Any change in the composition of the coatings, thinners, or cleanup materials, or use of new coatings, thinners, or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for R001:
- a. The name and identification number of each coating, thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon.
 - c. The individual air toxics (as identified in Section A.2.a) content of each coating, thinner, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, thinner, and cleanup material employed.
 - e. The total VOC emissions from all coatings, thinners, and cleanup materials employed, in pounds.
 - f. The total numbers of hours the emissions unit was in operation during the month.
 - g. The average hourly VOC emission rate for all coatings, thinners, and cleanup materials (i.e., C.1.e divided by C.1.f), in pounds per hour (average).
 - h. The total emissions of each individual air toxic (identified in Section A.2.a) from all coatings, thinners, and cleanup materials employed, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing that the coating line emitted more than 16.5 pounds VOC per hour (average). The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the VOC emission limit of 16.5 pounds per hour shall be based upon the recordkeeping specified in Section C.1.g.
2. Compliance with the VOC emission limit of 31.5 tons per year shall be calculated as the sum of the 12 monthly total VOC emissions rates (recorded in Section C.1.e.) for the calendar year divided by 2000 lbs/ton.
3. The hourly emission rates for butyl acetate and methanol in Section A.2.a were calculated based on the maximum usage rates of coatings, thinners, and cleanup materials currently employed in the emissions unit. Therefore, these emission rates are not expected to be exceeded. (See A.2.b).
4. Utilization of a properly designed, maintained and operated exhaust filtration system will be deemed as compliance with the particulate matter emission limit of 0.551 pound per hour.
5. If required, compliance with the visible emission limit shall be determined in accordance with OAC rule 3745-17-03.
6. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating, thinner, and cleanup material.

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements contained in permit to install number 06-5335 issued for this emissions unit on December 30, 1997: A.1, A.2, C.1, D.1, and D.2.