Facility ID: 0679010303 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: 0679010303 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Overhead Line and Associated Drying Oven	OAC 3745-31-05 PTI # 06-5635	See Sections B.1 and A.2.b. Emissions of OC shall not exceed 7.3 tons per year.
	OAC 3745-21-07	During any day in which a photochemically reactive material is employed in this emissions unit, emissions of organic compounds (OC) from R002 shall neither exceed 8 pounds per hour nor 40 pounds per day. See Section A.2.a.
	OAC 3745-17-07	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except for a period of 6 consecutive minutes in any 60 minutes. Visible particulate emissions shall not exceed 60 percent opacity, as a 6-minute average, at any time.
	OAC 3745-17-11	Emissions of particulate matter from each booth shall not exceed 0.551 pound per hour.

2. **Additional Terms and Conditions**

   (a) The oven associated with R002 is not subject to the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(1) because no baking or heat curing of the coatings occurs in the flashoff and drying oven.
   This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 06-5635. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the xylene, ethanol, and butyl acetate emission limitations specified in this permit for combined emissions units R001, R002, and R003 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 units' 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: Xylene

   TLV (ug/m3): 434,000
   Maximum Hourly Emission Rate (lbs/hr): 6.0
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2292
   Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333

   Pollutant: Ethanol

   TLV (ug/m3): 188,000
   Maximum Hourly Emission Rate (lbs/hr): 58.96
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9640
   Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44762

Pollutant: Butyl Acetate

TLV (ug/m3): 713,000
Maximum Hourly Emission Rate (lbs/hr): 1.7
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2000
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16976
As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

i. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, 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);

iii. any change in the composition of the coatings or cleanup materials, or use of new coatings 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)]; and

iv. any change in the composition of the coatings or cleanup materials, or use of new coatings 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).

For 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, the permittee shall obtain a permit to install prior to the change.

B. **Operational Restrictions**

1. The total quantity of OC applied (emitted) in R001, R002, and R003 shall not exceed 64.6 tons per rolling, 12-month period.

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

1. The permittee shall collect and record the following information each day for R002:
The name and identification number of each coating, thinner, and cleanup material and a statement as to whether or not each is a "photochemically reactive material".
The OC content of each coating, thinner, and cleanup material, in pounds per gallon.
The number of gallons of each coating, thinner, and cleanup material employed.
The total OC emissions (OC applied) from all coatings, thinners, and cleanup materials employed [the sum of (C.1.b times C.1.c) for all coatings, thinners, and cleanup materials], in pounds.
For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (C.1.e divided by C.1.f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain monthly records of the rolling, 12-month summation of the total OC emissions for R001, R002, and R003 combined, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly reports which include the total, rolling, 12-month OC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, and R003, in tons, for each calendar month. 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, within 30 days after the occurrence, which include the following information:
For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

E. **Testing Requirements**

1. Compliance with the emission limitations of 8 pounds OC per hour and 40 pounds of OC per day shall be based upon the record keeping specified in C.1.g and C.1.e respectively.

2. Compliance with the air toxics requirements have been determined by modeling the maximum total combined emission rates for R001-R003 to determine the predicted 1-hour maximum ground-level concentration at the fenceline. Therefore, the hourly emission rates can not be exceeded under current conditions. As required above and by OAC rule 3745-31-02, any change in the coatings used or in the operation of the emissions units which would increase the emission rate of any individual air toxic would require a new permit to install.

3. Compliance with the rolling, 12-month emission limitations and usage restrictions above for OC shall be determined in accordance with the following method:

   Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings, thinners, and cleanup materials. The OC emission rate and usage restrictions for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate OC content determined for that material. The OC emission rate and usage rate for each month shall be calculated by adding the emission rates and usage rates for all coatings, thinners, and cleanup materials employed during the month. The rolling, 12-month summations for total OC shall be calculated each month by adding the OC emission rate for that month to the OC emission rate for the previous 11 calendar months (this same method shall be used to calculate rolling, 12-month usage).

4. Compliance with the visible particulate emission limit shall be determined in accordance with OAC rule 3745-17-03.

5. Compliance with the particulate matter emission limit of of 0.551 pound per hour shall be determined based on emission testing conducted in accordance with OAC rule 3745-17-03. Emission testing is not specifically required to demonstrate compliance with this emission limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

6. Compliance with the annual particulate matter emission limit shall be determined by multiplying the tested particulate matter emission rate, in pound(s) per hour, by the actual hours of operation per year, and dividing by 2000.

F. **Miscellaneous Requirements**

1. None