Facility ID: 0679020170 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: 0679020170 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

Go to the top of this document

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
Finish booth.	OAC rule 3745-31-05(A)(3) PTI # 06-07044, issued 12/12/2002	Emissions of volatile organic compounds (VOC) shall not exceed 52.4 lbs/day, 9.6 tons/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09 (U)(1)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed either 0.551 pound per hour or 2.5 tons per year.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

2. **Additional Terms and Conditions**

   (a) The 52.4 lbs VOC/day and 9.6 tons VOC/year emission limitations were established for PTI purposes to reflect the emission unit's potential to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

B. **Operational Restrictions**

1. None

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 name and identification number of each metal coating, as applied.

   b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied.

   c. The daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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):

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4172

MAGLC (ug/m3): 4877
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 still 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.

3. 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.

D. **Reporting Requirements**

1. The permittee shall notify the Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

E. **Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):
   Emission Limitation:

   Emissions of volatile organic compounds (VOC) shall not exceed 52.4 lbs/day, 9.6 tons/yr.

   Applicable Compliance Method:

   The emission limitations, as noted in Section A.2.a, represent the maximum potential of the emissions unit as determined by multiplying the maximum coating VOC content by the maximum usage rate for that coating. Annual emissions are calculated assuming every day operation.

   (15 gals/day)(3.492 lbs/gal) = 52.4 lbs/day
   (52.4 lbs/day)(365 days/yr)(0.0005 ton/lb) = 9.56 tons/yr
   Emission Limitation:

   The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

   Applicable Compliance Method:

   Compliance with the VOC content limitation of 3.5 pounds VOC per gallon of coating shall be based upon the record keeping specified in Section C.1 of this permit.
   Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
   Emission Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

   Applicable Compliance Method: Compliance shall be determined by the following equation:

   (max usage rate)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)

   Currently: (1 gal/hr)(11.0 lbs/gal)(0.56 solids)(0.50 transfer)(0.024 control) = 0.74 lb/hr
   Emission Limitation: Particulate emissions shall not exceed 2.5 tons per year.

Applicable Compliance Method: Compliance shall be determined by the summation of the results of the following equation for each coating: (annual usage)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)(0.0005 ton/lb) = TPY
Emission Limitation: Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

Applicable Compliance Method: If required, compliance with these emission limits shall be demonstrated in accordance with 40 CFR 60 Appendix A, Method 9.

F. **Miscellaneous Requirements**

1. None