Facility ID: 0679020177 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: 0679020177 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 |
|---|---|---|
| spray booth # 2 | OAC rule 3745-31-05(A)(3) (PTI 06-06007) | Emissions of organic compounds (OC) shall not exceed 9.25 lbs/hr on any day during which no photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.<br><br>Emissions of OC shall not exceed 40.5 tpy.<br><br>Compliance with the Air Toxics Policy. See sections C.3 through C.5.<br><br>Use of controls for particulate matter. See section A.2.a.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D). |
| | OAC rule 3745-21-07(G)(2) | Emissions of OC shall not exceed 8 lbs/hr and 40 lbs/day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit. |
| | OAC rule 3745-31-05(D) Federally enforceable limitations to avoid Title V | Combined emissions of OC from emissions units R001, R002, and R003 shall not exceed 47.25 tons during any consecutive 12-month period. |

2. **Additional Terms and Conditions**

   (a) The permittee shall utilize controls for particulate matter (enclosure and filters) at all times when coatings are being applied.

B. **Operational Restrictions**

1. Combined coating usage in emissions units R001, R002, and R003 shall not exceed 15,000 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 is a photochemically reactive material and identification of each day during which any photochemically reactive coating or cleanup material 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 emission 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 emission 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 any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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, R002, and R003, combined;

b. the total OC emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined;

c. the total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined, for the previous 12-month period; and

d. the total OC emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined, for the previous 12-month period.

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

3. The permit to install for this emissions unit (PTI 06-06007) 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 (lbs/hr): 0.925

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1182

MAGLC (ug/m3): 3619

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): 5319

MAGLC (ug/m3): 12500

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 photochemically reactive coating or cleanup material 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 photochemically reactive coating or cleanup material 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 photochemically reactive coating or cleanup material 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, R002, and R003, combined with the previous 11-month period exceeded 47.25 tons, and the actual OC emission rate for that 12-month period; and

e. an identification of each month during which the total usage rate for all coatings employed in emissions units R001, R002, and R003, combined with the previous 11-month period exceeded 15,000 gallons, and the actual usage rate for that 12-month period.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

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:
Emission Limitations:

Emissions of OC shall not exceed 9.25 lbs/hr on any day during which no photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of OC shall not exceed 8 lbs/hr and 40 lbs/day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of OC shall not exceed 40.5 tpy.

Combined emissions of OC from emissions units R001, R002, and R003 shall not exceed 47.25 tons during any consecutive 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance in accordance with the record keeping requirements specified in sections C.1 and C.2 of these terms and conditions.

Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

F. **Miscellaneous Requirements**

1. None