

Facility ID: 0684000211 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: 0684000211 Emissions Unit ID: R001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Booth (Miscellaneous Metal Parts)	OAC rule 3745-31-05 (A)(3) PTI # 06-5867	VOC emissions shall not exceed 20 lbs/hr, excluding cleanup materials.
		VOC emissions shall not exceed 2.75 tpy including cleanup materials.
		Particulate emissions shall not exceed 2.4 tpy.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (using daily volume-weighted average)
	OAC rule 3745-21-09(U)(1)(b)	4.0 lbs of VOC per gallon of coating, excluding water and exempt solvents, for a zinc rich primer coating (using daily volume-weighted average)
	OAC rule 3745-17-11	This emissions unit is limited to 0.551 lb/hr of particulate emissions.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

2. **Additional Terms and Conditions**
 - (a) The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 99% during any operation of this emissions unit.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system (spray booth filter) whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day:
 - a. the name, identification number and coating type (i.e., extreme performance coating or zinc rich primer) for each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) of each coating, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the daily volume-weighted average VOC content of the extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - e. the daily volume-weighted average VOC content of the zinc rich primers, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - f. the total VOC emission rate for all coatings, in pounds per day;

- g. the total number of hours the emission unit was in operation; and
 - h. the average hourly VOC emission rate for all coatings (item C.1.f divided by item C.1.g.), in pounds per hour (average).
- 2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in lbs/gal; and
 - d. the total VOC emissions from all coatings and cleanup materials, in pounds or tons.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was (spray booth filter) not in service when the emissions unit was in operation.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office-Southeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC contents and/or hourly emission rate exceeded the applicable limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office-Southeast District Office) within 30 days after the exceedance occurs.
- 2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office-Southeast District Office) by January 31 of each year.
- 3. The permittee shall notify the Director (the appropriate District Office-Southeast District Office) in writing of any daily record showing that the dry filtration system (spray booth 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 (the appropriate Ohio EPA District Office-Southeast District Office) within 30 days after the event occurs.
- 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Condition 2 of this permit.

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 Limitation:
 - 20 lbs/hr of VOC
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.
 - Emission Limitation:
 - 2.73 tpy of VOC
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping specified in sections C.1 and C.2 and shall be the sum of the 12 monthly VOC emission totals for the calendar year.
 - Emission Limitation:
 - 3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents (using daily volume-weighted average), for an extreme performance coating
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
 - Emission Limitation:
 - 4.0 lbs of VOC per gallon of coating, excluding water and exempt solvents (using daily volume-weighted average), for a zinc rich primer coating
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
 - Emission Limitation:
 - 0.551 lb/hr of particulate emissions
 - Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr);

M = maximum coating solids usage rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitations:

2.4 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly particulate emission limitation (0.551 lb/hr) by the actual hours of operation per year, and dividing by 2000 lbs/ton.

Emission Limitation:

20% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04 (A).

F. **Miscellaneous Requirements**

1. None