

Facility ID: 0744010149 Issuance type: Final State Permit To Operate

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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: 0744010149 Emissions Unit ID: K001 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>
K001 - Powder Paint System with booth and natural gas-fired ovens, for use on misc. metal parts.	OAC rule 3745-31-05(A)(3) (PTI 07-00517)	Nitrogen oxides (NOx) emissions shall not exceed 4.1 lbs/hr and 17.96 tpy.
		Carbon monoxide (CO) emissions shall not exceed 3.44 lbs/hr and 15.07 tpy.
		Volatile organic compounds (VOC) emissions shall not exceed 1.13 lbs/hr and 4.95 tpy.
		Particulate emissions (PE) shall not exceed 1.66 lbs/hr and 7.27 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	See sections A.2.a and A.2.b. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(i)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-08(B)	See section A.2.c.
	OAC rule 3745-23-06(B)	See section A.2.d.

2. Additional Terms and Conditions

- (a) The powder coatings applied in this emissions unit shall not exceed a VOC content of 1%, by weight.

The hourly emission limitations were established to reflect the potentials to emit for the powder paint system. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 07-00517.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology

requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 07-00517.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

1. The powder paint system shall not be operated without the use of the primary and final filters.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating, in percent by weight of powder coating.
2. The permittee shall maintain daily records that document any time periods when the primary and final filters were not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any record showing an exceedance of the 1%, by weight, VOC limit for the powder coatings applied. This report shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters. If no deviations occur during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.
2. The permittee shall notify the Portsmouth Local Air Agency in writing of any daily record showing that the primary and/or final filters were 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 Portsmouth Local Air Agency within 30 days after the event occurs.

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:

NOx emissions shall not exceed 4.1 lbs/hr.

Applicable Compliance Method:

The hourly emission limitation was determined by multiplying the maximum natural gas usage from the ovens (0.041 mmcf/hr) by the NOx emission factor of 100 lbs/mmcf. The NOx emission factor was obtained from AP-42, Compilation of Air Pollutant Emission Factors, 5th Edition, Table 1.4-1, dated 7/98.

Emission Limitation:

NOx emissions shall not exceed 17.96 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable NOx emission limitation (4.1 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

Emission Limitation:

CO emissions shall not exceed 3.44 lbs/hr.

Applicable Compliance Method:

The hourly emission limitation was determined by multiplying the maximum natural gas usage from the ovens (0.041 mmcf/hr) by the CO emission factor of 84 lbs/mmcf. The CO emission factor was obtained from AP-42, Compilation of Air Pollutant Emission Factors, 5th Edition, Table 1.4-1, dated 7/98.

Emission Limitation:

CO emissions shall not exceed 15.07 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (3.44 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

Emission Limitation:

VOC emissions shall not exceed 1.13 lbs/hr.

Applicable Compliance Method:

The hourly emission limitation was determined by the summation of the emissions from the oven and powder paint booth. Emissions from the oven were determined by multiplying the maximum natural gas usage from the ovens (0.041 mmcf/hr) by the VOC emission factor of 5.5 lbs/mmcf. The VOC emission factor was obtained from AP-42, Compilation of Air Pollutant Emission Factors, 5th Edition, Table 1.4-2, dated 7/98. Emissions from the powder paint booth were determined by multiplying the maximum amount of powder paint used (90 lbs/hr) by the maximum VOC content (1% by weight) of the powder coating. Formulation data from the material

manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the coating.

Emission Limitation:

VOC emissions shall not exceed 4.95 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (1.13 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

Emission Limitation:

PE shall not exceed 1.66 lbs/hr.

Applicable Compliance Method:

The hourly emission limitation was determined by the summation of the emissions from the oven and powder paint booth. Emissions from the oven were determined by multiplying the maximum natural gas usage from the ovens (0.041 mmcf/hr) by the particulate emission factor of 7.6 lb/mmcf. The particulate emission factor was obtained from AP-42, Compilation of Air Pollutant Emission Factors, 5th Edition, Table 1.4-2, dated 7/98. Emissions from the powder paint booth were determined by multiplying the maximum amount of powder paint used (90 lbs/hr) by the control efficiency of the booth (100-98.5%).

Emission Limitation:

PE shall not exceed 7.27 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.66 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate 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).

F. Miscellaneous Requirements

1. Pursuant to Ohio EPA's Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each air toxic compound will be less than 1.0 ton. OAC chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant, that has a listed TLV, to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.