

Facility ID: 0812090591 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.

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Facility ID: 0812090591 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 - Miscellaneous Metal Parts Paint Booth	OAC rule 3745-31-05(A)(3) PTI 08-04768	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-09(U)(1)(c).
		See Section A.2.a.
	OAC rule 3745-31-05(C) (Synthetic Minor to avoid NSR and Title V)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 51 TPY from coatings, preparation and cleanup materials, based upon a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-21-18(C)	See Sections B.2, B.3, B.4, and B.5.

2. Additional Terms and Conditions

- (a) The VOC content of the preparation and cleanup materials employed shall not exceed 8 lbs per gallon, as applied, excluding water and exempt solvents.

B. Operational Restrictions

1. The annual coating usage for this emissions unit shall not exceed 28,600 gallons, based upon a rolling, 12-month summation.

The annual preparation and cleanup material usage for this emissions unit shall not exceed 250 gallons, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating usage and the preparation and cleanup usage specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage, in Gallons	Maximum Allowable Cumulative Preparation and Cleanup Material Usage, in Gallons
1	5,800	55
1-2	11,600	110
1-3	17,400	165
1-4	23,200	220
1-5	28,600	250
1-6	28,600	250
1-7	28,600	250
1-8	28,600	250
1-9	28,600	250
1-10	28,600	250
1-11	28,600	250
1-12	28,600	250

1 5,800 55
 1-2 11,600 110
 1-3 17,400 165
 1-4 23,200 220
 1-5 28,600 250
 1-6 28,600 250
 1-7 28,600 250
 1-8 28,600 250
 1-9 28,600 250
 1-10 28,600 250
 1-11 28,600 250
 1-12 28,600 250

After the first 12 calendar months of operation, compliance with the annual coating usage and the preparation and cleanup material usage limitations shall be based upon a rolling, 12-month summation of the coating usage and the preparation and cleanup material usage.

2. The permittee shall use one or more of the following application techniques, in accordance with manufacturer's specifications, to apply any coating containing a VOC as a pretreatment, primer, sealant, basecoat, clear coat, or topcoat to mobile equipment for commercial purposes:
 - a. flow or curtain coating;
 - b. dip coating;
 - c. roller coating;
 - d. brush coating;
 - e. cotton-tipped swab application;
 - f. electro-deposition coating;
 - g. high volume, low pressure (HVLP) spraying;
 - h. electrostatic spray;
 - i. airless spray;
 - j. air-assisted airless spray; and
 - k. Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the Director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone.
 3. A person at the facility shall be properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with manufacturer's specifications, and the handling of a coating and any solvents used to clean the sprayer.
 4. Spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:
 - a. an enclosed spray gun cleaning system that is kept closed when not in use;
 - b. un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;
 - c. disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and
 - d. atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.
 5. The permittee shall store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:
 - a. fresh coatings;
 - b. used coatings;
 - c. solvents;
 - d. VOC-containing additives and materials;
 - e. VOC-containing waste materials; and
 - f. cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly records of the following information:
 - a. the coating usage;
 - b. the preparation and cleanup material usage; and
 - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summations of the coating usage and the preparation and cleanup material usage.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative coating usage and the preparation and cleanup material usage for each calendar month.
 2. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed;

- d. the name and identification of each preparation and cleanup material employed;
- e. the VOC content of each preparation and cleanup material, in pounds per gallon;
- f. the number of gallons of each preparation and cleanup material employed; and
- g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons as a rolling 12-month summation.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit-to-install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations on coating usage and preparation and cleanup material usage; and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative coating usage and preparation and cleanup material usage. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emissions limitation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(F).
5. Not later than 120 days after startup, the permittee shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings required in Section B.2 are in use at the facility. The documentation also shall verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. This documentation shall be submitted to the appropriate Ohio EPA district office or local air agency. In addition, the owner or operator shall retain the documentation on site and make the documentation available to the Ohio EPA or local air agency upon request.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Section C.2.
 - b. Emission Limitation -
The VOC content of the preparation and cleanup materials employed shall not exceed 8 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Section C.2.
 - c. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 51 TPY from coatings, preparation and cleanup materials, based upon a rolling, 12-month summation.

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Section C.2.

F. Miscellaneous Requirements

1. None

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 - (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>
P001 - Abrasive Blasting Booth with Baghouse	OAC rule 3745-31-05(A)(3) PTI 08-04768	The particulate emissions (PE) from this emissions unit shall not exceed 8.4 lbs/hr and 36.8 tons per year (TPY).
	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 5 percent opacity as a six-minute average. The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
 - (a) The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop 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 perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (iv) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation -

The PE from this emissions unit shall not exceed 8.4 lbs/hr.

Applicable Compliance Method -

Compliance shall be determined by multiplying the PE grain loading from the baghouse (0.020 gr/dscf) by the stack air flow rate (49,000 cfm), by 60 minutes per hour and dividing by 7,000 grains per pound.

b. Emission Limitation -

The PE from this emissions unit shall not exceed 36.8 TPY.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly PE rate (8.4 lbs/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 lbs/ton.

c. Emission Limitation -

The visible PE from any stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method -

Compliance 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).

F. **Miscellaneous Requirements**

1. None