

Facility ID: 0812100207 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.

- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
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Facility ID: 0812100207 Emissions Unit ID: K002 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>
K002 (Binks Paint Spray Booth #3) Manual Spray Paint Booth	OAC rule 3745-31-02(A)(2) PTI 08-04397	8.33 tons VOC per year, including cleanup.
	OAC Rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(2)(e). Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis.
	3745-21-09(U)(2)(e)	Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. Use less than eight gallons per day of coating.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The maximum daily coating use for this emissions unit shall not exceed eight gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied in the coating line.
 - c. The total volume, in gallons, of all the coatings applied in the coating line.
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon, (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of

coating as applied facility wide (sum of all the individual HAP contents from d).

- f. The name and identification number of each cleanup material, as employed.
- g. The volume, in gallons, of each cleanup material employed.
- h. The OC content, in pounds of OC per gallon, of each cleanup material employed
- i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
- j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i).
- k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
- l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating booth applied more than eight gallons per day. 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 45 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - b. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in the General Terms and Conditions.
- 3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, in gallons.
 - b. The total VOC emissions, in tons, from coating materials as applied.
 - c. The total OC emissions, in tons, from cleanup materials as employed.
 - d. The total individual HAP emissions, in tons, from coating usage and cleanup materials employed facility wide.
 - e. The total combined HAP emissions, in tons, from coating usage and cleanup materials employed facility wide. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the daily coating usage limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-
Less than or equal to 8 gallons/day of coatings usage.

Applicable Compliance Method-
Compliance shall be based on the recordkeeping specified in Section C.1.
 - b. Emission Limitation -
8.33 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in section C.2. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

F. Miscellaneous Requirements

- 1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 0812100207 Emissions Unit ID: K003 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>
K003 - Manual spray booth, with an infrared drying oven; misc. metal parts	OAC rule 3745-31-05(A)(3) PTI 08-04397	52.5 lbs VOC/day, excluding cleanup. 0.45 ton OC/year clean up material.
	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(1)(c) VOC emissions shall not exceed 9.58 tons per year (TPY) including cleanup on a 12 month rolling basis. Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis.
	OAC rule 3745-21-09(U)(1)(c)	Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis. 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. Solvent based coatings usage in this emissions unit shall not exceed 15.0 gallons per day.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, (excluding water and exempt solvents), as applied.
 - d. The total VOC emissions from all coatings applied, in pounds per day, for this emissions unit (the sum of b times c for each coating).
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
 - f. The name and identification number of each cleanup material, as employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The OC content of each cleanup material employed, in pounds of OC per gallon.

- i. The individual HAP content of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
 - j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i)).
 - k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
 - l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
 - m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
 - n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).
 - o. The total number of days each booth is in operation per month.
3. The permit to install for this emissions unit K003 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: n-butyl acetate

TLV (mg/m3):713

Maximum Hourly Emission Rate (lbs/hr): 9.85*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 702.4

MAGLC (ug/m3): 16,976

Pollutant: Methyl n-Amyl Ketone*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 218

MAGLC (ug/m3): 5,548

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.).
4. 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.

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 Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily 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.
 - 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the 52.5 pounds VOC per day limit was exceeded for this emissions unit.
 - b. All days when solvent based coatings usage in this emissions unit exceeded 15.0 gallons per day.
 - c. Exceedances of the rolling 12-month coating usage limitation.
 - d. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - e. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in the General Terms and Conditions.
 - 3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, based on a 12 month rolling summation, in tons.
 - b. The total VOC emissions, in tons from coating materials as applied.
 - c. The total OC emissions, in tons from cleanup materials as employed.
 - d. The total individual HAP emissions from coating usage and cleanup materials employed facility wide.
 - e. The total combined HAP emissions from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
- 1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
52.5 lbs VOC/day

Applicable Compliance Method -
Compliance shall be determined as follows:

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon.
 - b. Emission Limitation -
9.58 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly VOC emission rates for the previous 12 months in pounds or tons.

 - c. Emission Limitation -
0.45 TPY OC from cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the summation of the monthly OC emission rates from cleanup activities for the previous 12 months in pounds or tons.

 - d. Emission Limitation -
3.50 lbs VOC/gallon coatings, excluding water and exempt solvents

Applicable Compliance Method -
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."
- F. Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 0812100207 Emissions Unit ID: K005 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>
K005 Hydraulic Cylinder Paint System, miscellaneous metal parts	OAC rule 3745-31-02(A)(2)	1.5 tons volatile organic compound(VOC) per month and 10.5 tons VOC per year including cleanup.
	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and 3745-21-09(U)(1)(c) Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis
	OAC rule 3745-21-09(U)(1)(c)	Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis 3.5 lbs VOC/gal of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified above.

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, as applied.
 - b. The volume, in gallons, of each coating applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt solvents), as applied.
 - d. The name and identification of each cleanup material employed.
 - e. The VOC content of any solvent based cleanup material, in pounds of VOC per gallon of cleanup material.
 - f. The volume, in gallons of any solvent based cleanup material employed.
 - g. The total VOC emissions from all coatings and any solvent based cleanup materials employed, in pounds or tons per month.
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt

solvents), as applied.

- d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
- e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
- f. The name and identification number of each cleanup material, as employed.
- g. The volume, in gallons, of each cleanup material employed.
- h. The OC content of each cleanup material employed, in pounds of OC per gallon.
- i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
- j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i)).
- k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
- l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 (appropriate District Office or local air agency) within 30 days following the end of the month.
2. The permittee shall submit quarterly (excursion) reports that identify:
 - a. Each month during which the monthly VOC emissions from the coatings and cleanup materials exceeded 1.5 tons VOC/month.
 - b. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - c. Exceedances of the rolling 12-month facility wide combined HAP limitation.

These quarterly excursion reports shall be submitted as specified in the General Terms and Conditions.
3. The permittee shall also submit annual reports which specify:
 - a. the total VOC emissions from this emissions unit, in tons.
 - b. The total individual HAP emissions, in tons from coating usage and cleanup materials employed facility wide.
 - c. The total combined HAP emissions, in tons from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-
1.5 tons VOC/month including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in section C.1. and shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon divided by 2,000 pounds per ton.
 - b. Emission Limitation-
10.5 tons VOC/yr including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in section C.1. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.
 - c. Emission Limitation -
3.50 lbs VOC/gallon coatings, excluding water and exempt solvents

Applicable Compliance Method -
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify

the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 0812100207 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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>
K006 Binks Spray Paint Booth, Misc. Metal Parts	OAC rule 3745-31-02(A)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(2)(e). Less than or equal to seven gallons per day coating usage 5.0 TPY of volatile organic compounds (VOC), including cleanup The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-09(U)(2)(e)
	OAC rule 3745-35-07(B)	Less than or equal to seven gallons per day coating usage 5.0 TPY of volatile organic compounds (VOC), including cleanup Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis.
	OAC rule 3745-21-09(U)(2)(e)	Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2)

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. The maximum daily coating use for this emissions unit shall not exceed seven gallons.

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 coating applied.
 - b. the volume, in gallons, of each coating material applied.

- c. the total volume, in gallons, of all of the coatings applied.
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
- a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon, (excluding water and exempt solvents), as applied.
 - d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
 - e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
 - f. The name and identification number of each cleanup material, as employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed, in pounds of OC per gallon of cleanup material employed.
 - i. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
 - j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i).
 - k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
 - l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
 - m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
 - n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating and the sum of g times j for each cleanup material).
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating booth applied more than seven gallons per day. 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 45 days after the exceedance occurs.
 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - b. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2. b of the General Terms and Conditions.
 3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, based on a 12 month rolling summation, in tons.
 - b. The total VOC emissions, in tons from coating materials as applied and cleanup materials.
 - c. The total OC emissions, in tons from cleanup materials as employed.
 - d. The total individual HAP emissions from coating usage and cleanup materials employed facility wide.
 - e. The total combined HAP emissions from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
1. Compliance with the emission limitation in section A.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation-
Less than or equal to seven gallons/day of coatings usage.

Applicable Compliance Method-
Compliance shall be based on the recordkeeping specified in Section C.1.
 - b. Emissions Limitation:
5.0 TPY of VOC, including cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by the annual sum of monthly VOC emission rates based upon the record keeping requirements specified in sections C.1 and C.2. shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0812100207 Emissions Unit ID: K007 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>
K007 - Manual spray booth, with an infrared drying oven; misc. metal parts	OAC rule 3745-31-05(A)(3)	52.5 lbs VOC/day, excluding cleanup. 0.45 tons OC/ year clean up.
	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07 and 3745-21-09(U)(1)(c) VOC emissions shall not exceed 9.58 tons per year (TPY) including cleanup on a 12 month rolling basis. Facility wide emissions of combined HAPs shall not exceed 24.9 TPY on a 12 month rolling basis. Facility wide emissions of any individual HAP shall not exceed 9.9 TPY on a 12 month rolling basis
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. Solvent based coatings usage in this emissions unit shall not exceed 15.0 gallons per day.

C. Monitoring and/or Record Keeping Requirements

1. 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The volume, in gallons, of each coating material applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, (excluding water and exempt solvents), as applied.
 - d. The total VOC emissions from all coatings applied, in pounds per day for this emissions unit (the sum of b times c for each coating).
2. The permittee shall collect and record the following information each month for each coating booth at the facility:
 - a. The name and identification number of each coating, as applied.

- b. The number of gallons of each coating material applied.
- c. The VOC content of each coating (excluding water and exempt solvents), as applied.
- d. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied facility wide.
- e. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating as applied facility wide (sum of all the individual HAP contents from d).
- f. The name and identification number of each cleanup material, as employed.
- g. The volume, in gallons, of each cleanup material employed.
- h. The OC content of each cleanup material employed, in pounds of OC per gallon.
- i. The individual content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as employed facility wide.
- j. The total combined HAP content for each HAP of each cleanup material, in pounds of combined HAPs per gallon of cleanup material as applied facility wide (sum of all the individual HAP contents from(i)).
- k. The total VOC emissions from all coatings applied, in pounds or tons per month and pounds or tons per rolling 12-month period for this emissions unit (the sum of b times c for each coating).
- l. The total OC emissions from all cleanup materials employed, in pounds or tons per month and pounds or tons for this emissions unit (the sum of g times h for each cleanup material).
- m. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each coating and the sum of g times i for each cleanup material).
- n. The total combined HAP emissions for all coatings and cleanup materials employed facility wide, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times e for each coating plus and sum of g times j for each cleanup material).
- o. The total number of days each booth is in operation per month.

3. The permit to install for this emissions unit K007 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: n-butyl acetate

TLV (mg/m3):713

Maximum Hourly Emission Rate (lbs/hr): 9.85*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 702.4

MAGLC (ug/m3): 16,976

Pollutant: Methyl n-Amyl Ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.05*

*This emissions rate represents a worst case scenario where the combined emissions from emissions units K003 and K007 are assumed to be emitted from K007. The two emissions units are within 100 meters of each other and the exhaust from K007 has a lower volumetric flow rate than K003.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 218

MAGLC (ug/m3): 5,458

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.).
4. 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.

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 Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily 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.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the 52.5 pounds VOC per day limit was exceeded for this emissions unit.
 - b. All days when solvent based coatings usage in this emissions unit exceeded 15.0 gallons per day.
 - c. Exceedances of the rolling 12-month coating usage limitation.
 - d. Exceedances of the rolling 12-month facility wide individual HAP limitation.
 - e. Exceedances of the rolling 12-month facility wide combined HAP limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2. b of the General Terms and Conditions.
- 3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings usage, based on a 12 month rolling summation, in tons.
 - b. The total VOC emissions, in tons from coating materials as applied.
 - c. The total OC emissions, in tons from cleanup materials as employed.
 - d. The total individual HAP emissions from coating usage and cleanup materials employed facility wide.
 - e. The total combined HAP emissions from coating usage and cleanup materials employed facility wide.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

- 1. 1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
52.5 lbs VOC/day

Applicable Compliance Method -
Compliance shall be determined as follows:

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the usage of each coating (gallons per day) multiplied by the coating VOC content (excluding water and exempt solvents), in pounds per gallon.
 - b. Emission Limitation -
9.58 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly VOC emission rates for the previous 12 months in pounds or tons.
 - c. Emission Limitation -
0.45 TPY OC from cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2. and shall be the summation of the monthly OC emission rates from cleanup activities for the previous 12 months in pounds or tons.

- d. Emission Limitation -
3.50 lbs VOC/gallon coatings, excluding water and exempt solvents

Applicable Compliance Method -

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A

F. **Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.