

Permit To Install Synthetic Minor Write-Up
13-03716
Voyale Corporation

Voyale Corporation is a facility located at 4510 East 71st Street, Cuyahoga Heights, Ohio. The facility operates a paint line with two (2) paint spray booths for the coating of automotive parts containers, one (1) radiant heat and forced ambient air dryer, and conveyor track. The process weight rate per booth is 4,000 lb/hr or 8,000 lb/hr for both booths. The company is proposing to emit VOCs, HAPs, and particulate emissions. Under the proposed operating schedule and coating usage the emissions will trigger a Title V permitting action based on potential emissions of VOCs and HAPs. The facility is interested in restricting themselves below the Title V threshold limits by a synthetic minor permit.

Potential Emissions

Based on engineering calculations the maximum potential to emit at 8,760 hours from both units combined is 147.17 tons per year of VOCs. The maximum potential to emit at 8,760 hours from both units combined is 37.32 tons per year of HAPs.

Synthetic Minor Strategy/New Source Status

Voyale Corporation intends to avoid the Title V permitting procedures by limiting the total coating usage for the facility equal to 11,950 gallons based on a rolling twelve (12) months summation. The facility intends to limit the amount of clean up solvent usage to 1,500 gallons based on a rolling twelve (12) month summation. By restricting the coating and cleanup usage for the mentioned emissions unit, the allowable emissions for HAPs will be limited to 9.95 tons per year, and the allowable emissions for VOC will be limited to 20.91 tons per year.

To ensure compliance with the above emission limits the applicant will be required to keep coating usage and cleanup solvent usage records and report of exceedances, if any.

Conclusion

The installation of the two (2) spray paint booths will be restricted to 9.95 tons per year of HAPs and 20.91 tons per year of VOC by federally enforceable limitations in the PTI.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Application No: 13-03716

DATE: 2/27/2001

Voyale Corporation
Jim Vojtech
4510 East 71st Street
Cuyahoga Heights, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA CBAPC PA



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-03716

Application Number: 13-03716
APS Premise Number: 1318171066
Permit Fee: **To be entered upon final issuance**
Name of Facility: Voyale Corporation
Person to Contact: Jim Vojtech
Address: 4510 East 71st Street
Cuyahoga Heights, OH 44105

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4510 East 71st Street
Cuyahoga Heights, Ohio**

Description of proposed emissions unit(s):
This permit is for the installation of a paint line consisting of two(2) spray booths, one(1) radiant heat and forced ambient dryer, and conveyor track.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	7.18
VOC	20.91
individual HAP	9.95

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K008 - A spray paint booth with particle filters, used for the coating of automobile parts containers.	OAC rule 3745-17-07(A)(1) OAC rule 3745-31-05(A)(3) OAC rule 3745-17-11(B)(1)

OAC rule 3745-31-05(D)

OAC rule 3745-21-09(U)(1)(d)

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Emissions Unit ID: K008

Applicable Emissions
Limitations/Control Measures

0.82 lbs/hr PE
3.59 tpy PE

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(U)(1), and 3745-17-07(A)(1).

5.23 lb VOC/hr for K008 & K009 combined.

20.91 tpy of volatile organic compounds as a rolling 12-month summation for the entire facility (Synthetic minor to avoid Title V requirements).

9.95 tpy of any single hazardous air pollutant as a rolling 12-month summation for the entire facility (Synthetic minor to avoid Title V requirements).

3.50 lb of volatile organic compounds (VOC)/ gallon of coating, excluding water and exempt solvents, as applied.

Visible particulate emissions from this emission source shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

The emission limitation established

by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. The maximum annual emission rates for the facility shall not exceed 9.95 tons per year of any single HAP based on a rolling, 12-month basis.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable Single HAP (tons)	Coating usage (gallons)	Cleanup solvent usage (gallons)
1	0.83	995.83	125
1 - 2	1.65	1991.66	250
1 - 3	2.48	2987.49	375
1 - 4	3.30	3983.32	500
1 - 5	4.13	4979.15	625
1 - 6	4.95	5974.98	750
1 - 7	5.78	6970.81	875
1 - 8	6.60	7966.64	1000
1 - 9	7.43	8962.47	1125
1 - 10	8.25	9958.30	1250
1 - 11	9.08	10954.13	1375
1 - 12	9.95	11950.00	1500

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating and cleanup material usage limitations shall be based upon the rolling 12-month summations of the emission of single HAPs.

Single HAP emissions			
Current month	+	Previous 11 months	Total 12-month
Tons of single HAP		tons of single HAP	<= 9.95 tons of single HAP

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Emissions Unit ID: K008

3. The maximum coating usage for the entire facility shall not exceed 11,950 gallons per 12-month rolling basis.
4. The maximum cleanup material usage for the facility shall not exceed 1,500 gallons per 12-month rolling basis.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The company's name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each individual coating and cleanup material employed, in lbs/gallon as applied.
 - c. The VOC content for each individual coating and cleanup material as applied excluding water and exempt solvent.
 - d. The number of gallons of each coating employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The total hours of operation for the coating line.
 - g. The organic HAP content for each individual HAP, in pounds per gallon, for all the coatings and cleanup materials employed as applied.
 - h. The actual solid content in the coating, as applied.
 - i. The actual VOC mass emission rate, lb/month.
 - j. The actual HAP mass emission rate, lb/month.
 - k. The cumulative monthly VOC emission rate.
 - l. The cumulative monthly HAP emission rate.
2. The permit to install for this emissions unit (K008) was evaluated based on the actual materials

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Emissions Unit ID: K008

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employed (coatings) 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. 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: ethylene glycol mono-butyl ether

TLV (mg/m³): 96,666.90 µg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 156.7

MAGLC (ug/m³): 2,301.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (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.).

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 submit quarterly deviation (excursion) reports to the CBAPC which include the following:
 - a. Identification of each day during which a non compliance coating was utilized, and the actual VOC content for each such coating.
 - b. Identification of each day during which a non compliance cleanup material was utilized, and the actual VOC emissions for each such day.
 - c. Identification of each day drying which the average hourly limit was exceeded, for each month.
2. The permittee shall submit annual reports to the CBAPC which summarize the following for this emissions unit:
 - a. The total VOC emissions from coatings used at this emissions unit for the previous calendar year.
 - b. The total VOC emissions from cleanup materials used at this emissions unit for the previous calendar year.
 - c. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - d. The total number of gallons of cleanup materials employed in this emissions unit for the

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Emissions Unit ID: K008

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previous calendar year.

These reports shall be submitted by January 31 of each year.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for the first 12 calendar months of operation.
4. These excursion reports shall be submitted quarterly in accordance with the general terms and conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 and the operational restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

0.82 lbs/hr PE

Applicable Compliance Method:

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

$$E = (\text{maximum coating solids usage rate, in lb/hr}) \times (1-TE) \times (1-CE)$$

where E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.90).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

- b. Emission Limitation

3.59 tpy PE

Emissions Unit ID: K008

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by multiplying the hourly emissions calculated in section E.1.a. by the appropriate total operating hours for the coating line and divided by 2,000.

c. Emission Limitation

5.23 lbs/hr VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in section C and using the following expression:

$$E = [(D) \times (Q)] / (T)$$

where:

E = total VOC emissions, lb/hr

D = VOC content of the coating, lb/gallon

Q = total coating usage, gallon/month

T = total operating schedule, hour/month

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

d. Emission Limitation

20.91 tpy VOC (facility wide synthetic minor limitation)

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in section C and using the following expression:

$$E = [(D \times Q) / (T)] / [2000]$$

where:

E = total VOC emissions, lb/hr

D = VOC content of the coating, lb/gallon

Q = total coating usage, gallon/month

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T = total operating schedule, hour/month
Conversion factor = 2000 lb/ton

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

e. Emission Limitation

9.95 tpy of any single HAP (facility wide synthetic minor limitation)

Applicable Compliance Method:

Compliance shall be demonstrated based on the terms and conditions specified in Part II, Sections B and C.

f. Emission Limitation

3.50 lb of volatile organic compounds (VOC)/ gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in section C.1.

g. Emission Limitation

Visible emissions shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9, if required.

h. Usage Restriction

11,950 gallons per 12-month rolling average for all the coatings used facility wide

Applicable Compliance Method

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Emissions Unit ID: K008

Issued: To be entered upon final issuance

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.

i. Usage Restriction

1,500 gallons per 12-month rolling average for all the cleanup material used facility wide

Applicable Compliance Method

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.

2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings and cleanup materials employed in this emissions unit. 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 cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K009 - A spray paint booth with particle filters, used for the coating of automobile parts containers.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)(1)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(1)(d)	

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PTI

Emissions Unit ID: K009

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Applicable Emissions
Limitations/Control Measures

0.82 lbs/hr PE
3.59 tpy PE

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(U)(1), and 3745-17-07(A)(1).

5.23 lb VOC/hr for K008 & K009 combined.

20.91 tpy of volatile organic compounds as a rolling 12-month summation for the entire facility (Synthetic minor to avoid Title V requirements).

9.95 tpy of any single hazardous air pollutant as a rolling 12-month summation for the entire facility (Synthetic minor to avoid Title V requirements).

3.50 lb of volatile organic compounds (VOC)/ gallon of coating, excluding water and exempt solvents, as applied.

Visible particulate emissions from this emission source shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

The emission limitation established

by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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Emissions Unit ID: K009

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2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The maximum annual emission rates for the facility shall not exceed 9.95 tons per year of any single HAP based on a rolling, 12-month basis.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable Single HAP (tons)	Coating usage (gallons)	Cleanup solvent usage (gallons)
1	0.83	995.83	125
1 - 2	1.65	1991.66	250
1 - 3	2.48	2987.49	375
1 - 4	3.30	3983.32	500
1 - 5	4.13	4979.15	625
1 - 6	4.95	5974.98	750
1 - 7	5.78	6970.81	875
1 - 8	6.60	7966.64	1000
1 - 9	7.43	8962.47	1125
1 - 10	8.25	9958.30	1250
1 - 11	9.08	10954.13	1375
1 - 12	9.95	11950.00	1500

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating and cleanup material usage limitations shall be based upon the rolling 12-month summations of the emission of single HAPs.

Single HAP emissions

Current month	+	Previous 11 months	Total 12-month
Tons of single HAP		tons of single HAP	<= 9.95 tons of single HAP

3. The maximum coating usage for the entire facility shall not exceed 11,950 gallons per 12-month rolling basis.
4. The maximum cleanup material usage for the facility shall not exceed 1,500 gallons per 12-month

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rolling basis.

Emissions Unit ID: K009

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The company's name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each individual coating and cleanup material employed, in lbs/gallon as applied.
 - c. The VOC content for each individual coating and cleanup material as applied excluding water and exempt solvent.
 - d. The number of gallons of each coating employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The total hours of operation for the coating line.
 - g. The organic HAP content for each individual HAP, in pounds per gallon, for all the coatings and cleanup materials employed as applied.
 - h. The actual solid content in the coating, as applied.
 - i. The actual VOC mass emission rate, lb/month.
 - j. The actual HAP mass emission rate, lb/month.
 - k. The cumulative monthly VOC emission rate.
 - l. The cumulative monthly HAP emission rate.
2. The permit to install for this emissions unit (K009) was evaluated based on the actual materials employed (coatings) 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. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model

Voyale Corporation
PTI Application 13-02710
Issue

Facility ID: 1318171066

Emissions Unit ID: K009

was

Voya

PTI

Emissions Unit ID: K009

Issued: To be entered upon final issuance

compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethylene glycol mono-butyl ether

TLV (mg/m³): 96,666.90 µg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 156.7

MAGLC (ug/m³): 2,301.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (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.).

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:"

Voya

PTI

Emissions Unit ID: K009

Issued: To be entered upon final issuance

- 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 submit quarterly deviation (excursion) reports to the CBAPC which include the following:
 - a. Identification of each day during which a non compliance coating was utilized, and the actual VOC content for each such coating.
 - b. Identification of each day during which a non compliance cleanup material was utilized, and the actual VOC emissions for each such day.
 - c. Identification of each day drying which the average hourly limit was exceeded, for each month.
2. The permittee shall submit annual reports to the CBAPC which summarize the following for this emissions unit:
 - a. The total VOC emissions from coatings used at this emissions unit for the previous calendar year.
 - b. The total VOC emissions from cleanup materials used at this emissions unit for the previous calendar year.
 - c. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - d. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

These reports shall be submitted by January 31 of each year.

Emissions Unit ID: K009

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for the first 12 calendar months of operation.
4. These excursion reports shall be submitted quarterly in accordance with the general terms and conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 and the operational restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.82 lbs/hr PE

Applicable Compliance Method:

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

$$E = (\text{maximum coating solids usage rate, in lb/hr}) \times (1-TE) \times (1-CE)$$

where E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.90).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

b. Emission Limitation

3.59 tpy PE

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by multiplying the hourly emissions calculated in section E.1.a. by the appropriate total operating hours for the

Voya

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: K009

coating line and divided by 2,000.

- c. Emission Limitation

5.23 lbs/hr VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in section C and using the following expression:

$$E = [(D) \times (Q)] / (T)$$

where:

Voya

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: K009

E = total VOC emissions, lb/hr
D = VOC content of the coating, lb/gallon
Q = total coating usage, gallon/month
T = total operating schedule, hour/month

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

d. Emission Limitation

20.91 tpy VOC (facility wide synthetic minor limitation)

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in section C and using the following expression:

$$E = [(D \times Q) / (T)] / [2000]$$

where:

E = total VOC emissions, lb/hr
D = VOC content of the coating, lb/gallon
Q = total coating usage, gallon/month
T = total operating schedule, hour/month
Conversion factor = 2000 lb/ton

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

e. Emission Limitation

9.95 tpy of any single HAP (facility wide synthetic minor limitation)

Applicable Compliance Method:

Compliance shall be demonstrated based on the terms and conditions specified in Part II,

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PTI

Issued: To be entered upon final issuance

Emissions Unit ID: K009

Sections B and C.

f. Emission Limitation

3.50 lb of volatile organic compounds (VOC)/ gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in section C.1.

g. Emission Limitation

Visible emissions shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9, if required.

h. Usage Restriction

11,950 gallons per 12-month rolling average for all the coatings used facility wide

Applicable Compliance Method

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.

i. Usage Restriction

1,500 gallons per 12-month rolling average for all the cleanup material used facility wide

Applicable Compliance Method

Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.

Emissions Unit ID: K009

2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings and cleanup materials employed in this emissions unit. 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 cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 13-03716

Facility ID: 1318171066

FACILITY NAME Voyale CorporationFACILITY DESCRIPTION Coating facility for the painting ofCITY/TWP Cuvahoga Heights**Emissions Unit ID: K009**SIC CODE 3479SCC CODE 3-09-016-01EMISSIONS UNIT ID K008EMISSIONS UNIT DESCRIPTION Paint line for the coating of automobile parts containersDATE INSTALLED February 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Non Attainment	0.82 lb/hr	1.65	0.82 lb/hr	3.59
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	3.79 lb/hr	7.58	5.23 lb/hr	10.46
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	N/A	2.65 lb/hr	5.30	2.65 lb/hr	9.95(facility wide)

APPLICABLE FEDERAL RULES:

NSPS?

NESHAPS?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**Enter Determination:** Engineering calculationsIS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ N/A**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Ethylene glycol mono-butyl ether

3 NEW SOURCE REVIEW FORM B

PTI Number: 13-03716

Facility ID: 1318171066

FACILITY NAME Voyale CorporationFACILITY DESCRIPTION Coating facility for the painting ofCITY/TWP Cuvahoga Heights**Emissions Unit ID: K009**SIC CODE 3479SCC CODE 3-09-016-01EMISSIONS UNIT ID K009EMISSIONS UNIT DESCRIPTION Paint line for the coating of automobile parts containersDATE INSTALLED February 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Non Attainment	0.82	1.65	0.82	3.59
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment - VOCs	3.79 lb/hr	7.58	5.23 lb/hr	10.46
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	N/A	2.65	5.30	12.65	9.95(facility wide)

APPLICABLE FEDERAL RULES:

NSPS?

NESHAPS?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Engineering calculationsIS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ N/A**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Ethylene glycol mono-butyl ether

NEW SOURCE REVIEW FORM B

PTI Number: 13-03716

Facility ID: 1318171066

FACILITY NAME Voyale Corporation

FACILITY DESCRIPTION Coating facility for the painting of

CITY/TWP Cuyahoga Heights

Emissions Unit ID: K009

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up

Voyale Corporation is a facility located at 4510 East 71st Street, Cuyahoga Heights, Ohio. The facility operates a paint line with two (2) paint spray booths for the coating of automotive parts containers, one (1) radiant heat and forced ambient air dryer, and conveyor track. The process weight rate per booth is 4,000 lb/hr or 8,000 lb/hr for both booths. The company is proposing to emit VOCs, HAPs, and particulate emissions. Under the proposed operating schedule and coating usage the emissions will trigger a Title V permitting action based on potential emissions of VOCs and HAPs. The facility is interested in restricting themselves below the Title V threshold limits by a synthetic minor permit.

Potential Emissions

Based on engineering calculations the maximum potential to emit at 8,760 hours from both units combined is 147.17 tons per year of VOCs. The maximum potential to emit at 8,760 hours from both units combined is 37.32 tons per year of HAPs.

Synthetic Minor Strategy/New Source Status

Voyale Corporation intends to avoid the Title V permitting procedures by limiting the total coating usage for the facility equal to 11,950 gallons based on a rolling twelve (12) months summation. The facility intends to limit the amount of clean up solvent usage to 1,500 gallons based on a rolling twelve (12) month summation. By restricting the coating and cleanup usage for the mentioned emissions unit, the allowable emissions for HAPs will be limited to 9.95 tons per year, and the allowable emissions for VOC will be limited to 20.91 tons per year.

To ensure compliance with the above emission limits the applicant will be required to keep coating usage and cleanup solvent usage records and report of exceedances, if any.

Conclusion

The installation of the two (2) spray paint booths will be restricted to 9.95 tons per year of HAPs and 20.91 tons per year of VOC by federally enforceable limitations in the PTI.

38 **NEW SC**

PTI Num

FACILITY

FACILITY DESCRIPTION

Coating facility for the painting of
automobile parts containers

Emissions Unit ID: K009
CITY/TWP Cuyahoga Heights

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	7.18
VOC	20.91
individual HAP	9.95