

Facility ID: 0812100581 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.

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[Go to Part II for Emissions Unit R001](#)

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Facility ID: 0812100581 Emissions Unit ID: P001 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>
P001 - polyurethane curing oven	OAC rule 3745-31-05(A)(3) (PTI 08-04507)	The organic compound (OC) emissions from this emissions unit shall not exceed 0.47 lb/hour, 11.3 lbs/day and 2.1 tons per year.
	OAC rule 3745-21-07(G)(1)	See A.2.a. The emissions limits established by this rule are less stringent than the limits established by OAC rule 3745-31-05(A)(3)
	OAC rule 3745-114-01	See section C.3. and 4. and D.3.

**2. Additional Terms and Conditions**

- (a) The 0.47 pound of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R001), the permittee shall utilize a value of 80% as the maximum percentage of the OCs employed in the spray booth from the application of polyurethane coatings that are emitted uncontrolled from the spray booth. The remaining 20% of the OCs employed in the spray booth from the application of polyurethane coatings shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon process design parameters.
2. The permittee shall collect and record the following information for each day for the oven:
  - (a) the total potential (prior to applying the booth/oven "split") daily OC emission rate for all polyurethane coatings employed in the coating operation (R001) associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (20% as defined in Section C.1 of this permit), in pounds per day.
3. The permit to install for this emissions unit P001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene  
 TLV (mg/m3): 18.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 2.94 lbs/hr  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 167.4 ug/m3  
 MAGLC (ug/m3): 4,486 ug/m3

4. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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
  - 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.).

**D. Reporting Requirements**

- The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day that the daily OC emissions exceeded 11.3 pounds per day, and the actual daily OC emissions for each such day.
- The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- 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):
  - Emission Limitation-  
0.47lb OC/hour  
  
Applicable Compliance Method-  
Compliance shall be determined by multiplying the total (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all polyurethane coatings employed in the coating operation (R001) associated with this emissions unit multiplied by the booth /oven "split" of 20%.
  - Emission Limitation-  
11.3 lbs OC/day  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in term C.2.
  - Emission Limitation-  
2.1 TPY of OC  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in term C.2. and shall be the sum of the 365 daily emission rates for the calendar year, divided by 2,000 lbs per ton.

**F. Miscellaneous Requirements**

- None

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**Part II - Special Terms and Conditions**

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- 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.
  - None.
- 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.
  - 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>
R001 - Tank seam coating and edge treatment spray booth	OAC rule 3745-31-05(A)(3) (PTI 08-04507)	The organic compound (OC) emissions from this emissions unit including cleanup shall not exceed 6.19 lbs/hour, 148.6 lbs/day and 26.94 tons/year.
	OAC rule 3745-21-07(G)(2)	See A.2.a.
	OAC rule 3745-114-01	See A.2.b. and D.1. See Section C.3 and 4 and D.4

2. **Additional Terms and Conditions**

- (a) The 6.19 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation. This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. There are two separate coatings applied to fuel tank seams in this emissions unit; saran and polyurethane. The booth is designed so that all of the OCs applied in the saran coating step will flash off prior to application of the polyurethane coating. All of the OCs employed for clean up are also emitted from this emissions unit. For purposes of calculating the OC emission rates for this emissions unit and the associated oven (P001), the permittee shall utilize a value of 80% as the maximum percentage of the OCs employed in this emissions unit from the application of polyurethane coatings that are emitted uncontrolled from the emissions unit. The remaining 20% of the OCs employed in this emissions unit from the application of polyurethane coatings shall be considered to be the uncontrolled emissions for the associated oven.

2. The permittee shall collect and record the following information for each day for the coating operation:

- a. The company identification for each coating and clean up material employed.
- b. The number of gallons of each coating and clean up material employed.
- c. The OC content of each coating and clean up material, as applied, in pounds per gallon.
- d. The total daily OC emission rate for all non-polyurethane coatings applied and clean up materials, in pounds per day ( b x c for saran coating and clean up materials).
- e. The total (after applying the booth/oven "split") daily OC emission rate for polyurethane coatings applied, in pounds per day ( b x c x 0.8 for polyurethane coatings).
- f. The total (after applying the booth/oven "split") daily OC emission rate for all coatings applied and clean up materials, in pounds per day ( d + e).

3. The permit to install for this emissions unit R001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene  
 TLV (mg/m3): 18.8 mg/m3  
 Maximum Hourly Emission Rate (lbs/hr): 2.94 lbs/hr  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 165 ug/m3  
 MAGLC (ug/m3): 4,486 ug/m3

4. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day that the daily OC emissions exceeded 148.6 pounds per day, and the actual daily OC emissions for each such day.
2. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due 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-  
6.19 lbs OC/hour including cleanup  
  
Applicable Compliance Method-  
Compliance shall be determined by summing the maximum hourly emission rates for the application of the "saran spray" and polyurethane. (See i. through iv. below)
    - i. The maximum hourly emission rate for the application of the "saran spray" is determined by multiplying the maximum hourly application rate (0.521 gallons/hour) of the "saran spray" times the maximum OC concentration (7.03 lbs OC/gallon) of the "saran spray".
    - ii. The maximum hourly emission rate for the application of the polyurethane coating is determined by multiplying the maximum hourly application rate (0.552 gallons/hour) of the polyurethane coating times the maximum OC concentration (4.37 lbs OC/gallon) of the polyurethane coating times the booth/oven "split" (0.8) for this emissions unit and the associated oven (P001).
    - iii. The maximum hourly emission rate for the clean up materials employed in this emissions unit is determined by multiplying the maximum hourly clean up material use rate (0.08 gallon/hour) times the maximum OC concentration (7.52 lbs OC/gallon) of the clean up material.
    - iv. The OC emission rate, in lbs/hour, for this emissions unit shall then be the sum of the results from i. through iii.
      - b. Emission Limitation-  
148.6 lbs OC/day including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in term C.2.
  - c. Emission Limitation-  
26.94 tons/year OC emissions including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in terms C.2. and shall be the sum of the 365 daily emission rates for the calendar year and divided by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

1. None