

Facility ID: 0812100584 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.

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

Facility ID: 0812100584 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Structural Steel Painting Operations	OAC rule 3745-31-05(A)(3) (PTI 08-04637)	The volatile organic compound (VOC) from this emissions unit shall not exceed 3.85 lbs/hour and 7.03 tons per year (TPY).
	OAC rule 3745-21-09(U)(1)(d)	See Section A.2.a. The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

2. **Additional Terms and Conditions**
 - (a) The 3.85 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for the emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emission unit:
 - a. The name and identification of each coating and thinner employed in this unit.
 - b. The volume, in gallons, of each coating and thinner employed.
 - c. The VOC content of each coating and thinner employed, in pounds of VOC per gallon.
2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating and thinner employed in this unit.
 - b. The volume, in gallons, of each coating and thinner employed.
 - c. The VOC content of each coating and thinner employed, in pounds of VOC per gallon.
 - d. The total VOC emissions from all coating, thinners, and cleanup materials employed, in pounds, for this emissions unit (the sum of b x c for each coating and thinner).
3. The permit to install for emissions unit K001 was evaluated based on the actual materials (coatings) employed, 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: Mineral Spirits (highest emission rate)

TLV (ug/m3): 434,192

Maximum hourly Emission Rate (lbs/hour): 1.67

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):656

MAGLC (ug/m3):4,342 (xylene lowest MAGLC)

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 "2002 TLVs and BEIs," by the 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 solely due to the emissions of any type of toxic contaminant not, previously emitted, and a modification of the existing permit to install will not be required, even if the air toxic contaminant emissions are greater than the de minimus in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. 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 monthly record showing the use of noncomplying coatings. The notification shall include as 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 also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year as calculated in C.2. These reports shall be submitted by January 31 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitations specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 3.85 lbs/hour including cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum daily coating usage rate (1.1 gallons per hour), by the maximum VOC content of the coating employed (3.5 lbs VOC/gallon).

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 7.03 TPY VOC including cleanup.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2 and shall be the summation of the monthly VOC emissions rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

Emission Limitation -
The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method -
Compliance shall be based upon records maintained as required in C.1. If required, USEPA Reference Methods 24 and 24A shall be used to determine the VOC contents for coatings. If the permittee determines that Method 24 or 24 A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
- F. Miscellaneous Requirements**
1. None