

Facility ID: 0812710450 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 0812710450 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>
Electrocoating dip tank with bake oven; misc. metal parts coating line.	OAC rule 3745-31-05 PTI# 08-3486	2.63 lbs of volatile organic compounds (VOC) per gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents (see A.I.2.a)  7023 lbs VOC/month 42.14 TPY VOC  1.0 TPY particulate emissions (PE)  1.10 TPY nitrogen oxides (NOx)
	OAC rule 3745-21-09 (U)(1)(c)	3.5 pounds of VOC per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents (see A.I.2.b)
	OAC rule 3745-17-10 (B)(1)	0.020 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	20% opacity, as a six-minute average, except as provided by rule

**2. Additional Terms and Conditions**

- (a) The VOC content of the coatings employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 2.63 lbs VOC/gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents. To ensure compliance with this VOC content limitation, the coating materials added to the dip tank on a monthly basis shall meet 2.63 pounds of VOC per gallon of coating materials, as a volume-weighted average, excluding water and exempt solvents.  
The VOC content of the coatings employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 3.5 lbs VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank on a daily basis shall meet 3.5 pounds of VOC per gallon of coating materials, as a volume-weighted average, excluding water and exempt solvents.  
This facility was a Title V facility based on hazardous air pollutant (HAP) emissions (i.e., the potential to emit of glycol ether emissions was greater than 10 TPY). However, based on the most recent information submitted by the permittee in its PTI modification application #08-3486, its coating materials have been reformulated such that no HAPs are now being employed in the coating materials employed in this emissions unit.  
  
If, at some point in the future, the permittee wishes to employ coating materials other than the coating materials contained in the most recent PTI modification application #08-3486, the permittee shall submit a PTI modification application in accordance with OAC Chapter 3745-31 and obtain a modified PTI prior to the change in coating materials.  
Since natural gas is the only fuel fired in this emissions unit, OAC Chapter 3745-18 is not applicable. Hence, there is no SO2 emission limitation established [based on OAC Chapter 3745-18] for this emissions unit.

**B. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each month for the electrocoating dip tank:
    - a. the name and identification number of each material added to the dip tank;
    - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank;
    - c. the number of gallons of each material added to the dip tank, excluding water and exempt solvents;
    - d. the monthly, volume-weighted average VOC content of the combination of materials added to the dip tank, excluding water and exempt solvents, i.e., the sum of (b) x (c) for all the individual materials, divided by the total number of gallons of all materials; and
    - e. the total VOC emissions from all of the coating materials employed, in pounds, i.e., the sum of (b) x (c) for all individual materials.
  2. The permittee shall collect and record the following information each day for the electrocoating dip tank:
    - a. the name and identification number of each material added to the dip tank;
    - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank;
    - c. the number of gallons of each material added to the dip tank, excluding water and exempt solvents; and
    - d. the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, excluding water and exempt solvents, i.e., the sum of (b) x (c) for all the individual materials, divided by the total number of gallons of all materials.
  3. The permittee shall maintain annual records of the amount of natural gas consumed in this emissions unit.
  4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports to the Director, in accordance with paragraph B.2.b. of the General Terms and Conditions, which identify each month during which the monthly VOC emission rate exceeded 7023 lbs, and the actual VOC emission rate for the month.
  2. 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 coating materials (i.e., for VOC content, based on a monthly volume-weighted average). 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.
  3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
  4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
  5. 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 coating materials (i.e., for VOC content, based on a daily volume-weighted average). 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.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A.1.1 of these terms and conditions shall be determined in accordance with the following method(s):
 

Emission Limitation-  
7023 lbs/month VOC

Applicable Compliance Method-  
Compliance shall be based upon the record keeping specified in Section C.1 of this permit.  
Emission Limitation-  
42.14 TPY VOC

Applicable Compliance Method-  
Compliance shall be based upon the record keeping specified in Section C.1 and shall be the summation of the monthly VOC emissions for the calendar year.  
Emission Limitations-  
1.00 TPY PE  
1.10 TPY NOX

Applicable Compliance Method-  
The permittee shall demonstrate compliance with the annual PE limitation based upon multiplying the emission factor for PE (filtrable) from USEPA's AP-42, Table 1.4-2 by the actual annual natural gas consumption rate (mmcu.ft/year) and dividing by 2000. Based on AP-42, 5th Edition (revised 7/98), the emission factor for filtrable PE is 1.9 lbs/mmcu.ft. of natural gas.

The permittee shall demonstrate compliance with the annual NOx emission limitation based upon multiplying the emission factor for NOx from USEPA's AP-42, Table 1.4-2 by the actual annual natural gas consumption

rate (mmcu.ft/year) and dividing by 2000. Based on AP-42, 5th Edition (revised 7/98), the emission factor for NOx is 100 lbs/mmcu.ft. of natural gas.

Emission Limitation-

2.63 lbs of VOC/gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents

Applicable Compliance Method-

Compliance with this limitation shall be based upon the record keeping specified in Section C.1 of this permit. The monthly, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Monthly volume-weighted average = [summation of (Gi X VOCi)] / [summation of Gi] for i = 1 to n

where:

i = 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that month

Gi = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that month

VOCi = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents

Emission Limitation-

3.5 lbs of VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents

Applicable Compliance Method-

Compliance with this limitation shall be based upon the record keeping specified in Section C.2 of this permit. The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Daily volume-weighted average = [summation of (Gi X VOCi)] / [summation of Gi] for i = 1 to n

where:

i = 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day

Gi = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOCi = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents

Emission Limitation:

0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon multiplying the emission factor for PE (filtrable) from USEPA's AP-42, Table 1.4-2 by the maximum hourly natural gas consumption rate (90 mmcu.ft/hr) and dividing by the oven's maximum heat input capacity. Based on AP-42, 5th Edition (revised 7/98), the emission factor for filtrable PE is 1.9 lbs/mmcu.ft.

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(9).

Emission Limitation:

20% opacity, as a six-minute average

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

2. USEPA Method 24 shall be used to determine the VOC contents of the coating materials added to the electrocoating dip tank. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.

**F. Miscellaneous Requirements**

1. None