Facility ID: 0819020243 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: 0819020243 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K002 - Coating/Staining Booth No. 2 | OAC rule 3745-31-05(A)(3) (PTI 08-04616) | The organic compound (OC) emissions from this emissions unit shall not exceed 2.35 lbs/hour, 23.5 lbs/day, and 4.4 tons per year, including cleanup.<br><br>See Section A.2.a. |
| | OAC rule 3745-21-07(G)(2) | The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). |

2. **Additional Terms and Conditions**

   (a) The 2.35 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with the emission limitation.

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, thinner, and cleanup material employed.

   b. The volume, in gallons, of each coating, thinner, and cleanup material employed.

   c. The OC content of each coating, thinner, and cleanup material employed, in pounds OC per gallon.

   d. The volume, in gallons, of each cleanup material disposed of as liquid waste.

   e. The total OC emissions from all the coatings, thinners, and cleanup materials employed, in pounds per day {[summation of (b x c) for all coatings, thinners, and cleanup materials] - minus [summation of (c x d) for cleanup materials disposed of as liquid waste]}.

2. The permittee shall collect and record each year the total OC emissions, in tons, from all the coatings, thinners, and cleanup materials employed (sum the daily OC emissions, from section C.1.e above, for the calendar year, and divide by 2000 lbs/ton).

3. The permit to install for emissions unit K002 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: 2-methyl-1-propanol

   TLV (ug/m3): 151,575

Maximum hourly Emission Rate (lbs/hour): 0.48

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):412

MAGLC (ug/m3):1,516

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum hourly Emission Rate (lbs/hour): 0.89

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):764

MAGLC (ug/m3):11,871

Pollutant: Amyl Acetate

TLV (ug/m3): 531,697

Maximum hourly Emission Rate (lbs/hour): 0.44

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):378

MAGLC (ug/m3):5,317

Pollutant: Ethanol

TLV (ug/m3): 1,884,254

Maximum hourly Emission Rate (lbs/hour): 0.39

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):335

MAGLC (ug/m3):18,843

Pollutant: Ethyl Acetate

TLV (ug/m3): 1,441,309

Maximum hourly Emission Rate (lbs/hour): 0.73

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):626

MAGLC (ug/m3):14,413
Pollutant: Isopropyl Alcohol

TLV (ug/m3): 819,468

Maximum hourly Emission Rate (lbs/hour): 0.98

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):841

MAGLC (ug/m3):8,195

Pollutant: Methyl Amyl Ketone

TLV (ug/m3): 233,497

Maximum hourly Emission Rate (lbs/hour): 0.28

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):204

MAGLC (ug/m3):2,335

Pollutant: Methyl Ethyl Ketone

TLV (ug/m3): 589,775

Maximum hourly Emission Rate (lbs/hour): 0.55

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):472

MAGLC (ug/m3):5,898

Pollutant: Methyl Isobutyl Ketone

TLV (ug/m3): 204,826

Maximum hourly Emission Rate (lbs/hour): 1.06

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):910

MAGLC (ug/m3):4,877

Pollutant: Mineral Spirits

TLV (ug/m3): 712,638

Maximum hourly Emission Rate (lbs/hour): 1.39

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3): 1,193

MAGLC (ug/m3):7,126

Pollutant: N-Butyl Acetate

TLV (ug/m3): 712,638

Maximum hourly Emission Rate (lbs/hour): 1.39

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):1,193

MAGLC (ug/m3):7,126

Pollutant: N-Butyl Alcohol

TLV (ug/m3): 60,630

Maximum hourly Emission Rate (lbs/hour): 0.56

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):481

MAGLC (ug/m3):606

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum hourly Emission Rate (lbs/hour): 1.91

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):1,639

MAGLC (ug/m3):1,884
Pollutant: VM&P Naptha

TLV (ug/m3): 1,398,773

Maximum hourly Emission Rate (lbs/hour): 1.13

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):970

MAGLC (ug/m3):13,988

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 contaminent not, previously emitted, and a modification of the existing permit to install will not be required, even if the air toxic contaminent 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 submit quarterly deviation (excursion) reports that include an identification of each day during which the OC emissions from adhesive use exceeded 23.5 pounds, and the actual OC emissions for each such day. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

2. The permittee shall submit annual reports to the Director (RAPCA) for this emissions unit that specify the following:

   a. The total annual coatings, thinners, and cleanup materials usages, in gallons.

   b. The total annual cleanup materials shipped off site for disposal, in pounds or tons.

   c. The total OC emissions, in pounds or tons, from all the coatings, thinners, and cleanup materials employed.

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

E. **Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
   Emission Limitation -
   The OC emissions from this emissions unit shall not exceed 2.35 lbs/hour, including cleanup.

   Applicable Compliance Method -
   Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum daily coating usage rate (0.363 gallon per hour) by the maximum OC content of the coatings employed (6.46 lbs OC/gallon).

   If required, compliance with the hourly allowable OC emission limitation shall be determined based on the results of emission testing conducted in accordance with Methods 18, 25,or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
   Emission Limitation -
   The OC emissions from this emissions unit shall not exceed 23.5 lbs/day, including cleanup.

   Applicable Compliance Method -
   Compliance with the daily allowable OC emission limitation shall be based upon record keeping requirements specified in section C.1 of this permit.
   Emission Limitation -
   The OC emissions from this emissions unit shall not exceed 4.4 tons OC/yr, including cleanup.

   Applicable Compliance Method -
   Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in section C.2 of this permit.

2. Formulation data or USEPA Method 24 shall be sued to determine the OC contents of the coaitngs, thinners, and cleanup materials.

F. **Miscellaneous Requirements**

1. None