

Facility ID: 0819070018 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.

[Go to Part II for Emissions Unit P014](#)
[Go to Part II for Emissions Unit P031](#)
[Go to Part II for Emissions Unit P041](#)

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Facility ID: 0819070018 Emissions Unit ID: P014 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
P014 - Sealing Compound Machine No. 2c - Heavy Duty West	OAC rule 3745-31-02(A)(2) (PTI 08-04324)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.84 pounds per day (lbs/day)*.
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	The sealant usage in this emissions unit shall be less than or equal to 1 gallon per day (7.3 lbs). The VOC emissions from this emissions unit shall not exceed 0.44 TPY, as a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(e)	The maximum daily sealant usage shall not exceed 1 gallon (7.3 lbs). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

* All VOC for this emissions unit is methyl ethyl ketone (MEK). Therefore it is not necessary for the permittee to maintain records of the combined HAP emissions for this emissions unit.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 1 gallon (7.3 lbs).
4. The annual sealant usage shall not exceed 150 gallons (1095 lbs), as a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.

- e. The VOC emissions, in pounds per day [i.e. the sum of (b x d) for all sealants employed].
2. The permittee shall collect and record the following information each month for the sealant machine:
- The total sealant usage for the month, in gallons.
 - The total VOC emissions from all sealants employed, in tons [i.e. the sum of the daily VOC emissions as recorded in Section C.1.e. above, divided by 2000 lbs/ton].
3. The permittee shall collect and record the following information each month for the entire facility:
- The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
 - The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P014) was evaluated based on the actual materials (typically coatings and cleanup 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 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" pollutants:

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1036

MAGLC (ug/m3): 14,042

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 still 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:

- 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.
- 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.
- 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.

5. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
 - 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 the following:

- a. An identification of each day during which the daily VOC emission rate exceeded the 5.84 lbs/day emission limitation, and the actual daily VOC emission rate for each such day.
 - b. An identification of each day during which the daily sealant usage exceeded the 1 gallon/day maximum sealant usage limitation, and the actual daily sealant usage for each such day.
 - c. An identification of each month during which the rolling, 12-month VOC emission rate exceeded the 0.44 TPY rolling, 12-month VOC emission limitation, and the actual rolling, 12-month VOC emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month sealant usage exceeded the 150 gallons/yr rolling, 12-month sealant usage limitation, and the actual rolling, 12-month sealant usage for each such month.
 - e. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - f. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
2. 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.
 3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
 4. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage for this emissions unit.
 - b. The VOC emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. 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 5.84 lbs/day

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 0.44 TPY, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

Emission Limitation -
The sealant usage employed in this emissions unit shall not exceed 1 gallon/day (7.3 lbs).

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

Emission Limitation -
The sealant usage employed in this emissions unit shall not exceed 150 gallons/year (1095 lbs), as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

Emission Limitation -
The VOC/gallon content of the sealant shall not exceed 5.84 lbs VOC/gallon
The MEK content of the sealant shall not exceed 5.84 lbs MEK/gallon

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit. 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.

Emission Limitation -
Any individual HAP from this facility shall be less than 9.9 TPY as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data

Emission Limitation -

The total combined HAPs from this facility shall be less than 24.9 TPY as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.

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Facility ID: 0819070018 Emissions Unit ID: P031 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
P031 - Sealing Compound Machine No. 1- Heavy Duty West	OAC rule 3745-31-02(A)(2) (PTI 08-04324)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 26.24 pounds per day (lbs/day)*.
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	The maximum daily sealant usage shall not exceed 4.5 gallons (7.3 lbs). The VOC emissions from this emissions unit shall not exceed 3.29 TPY, as a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(e)	The sealant employed in this emissions unit shall not exceed 1125 gallons (8213 lbs) per year, as a rolling, 12-month summation. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

* All VOC for this emissions unit is methyl ethyl ketone (MEK). Therefore it is not necessary for the permittee to maintain records of the combined HAP emissions for this emissions unit.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 4.5 gallons (7.3 lbs).
4. The annual sealant usage shall not exceed 1125 gallons (8213 lbs), as a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.

- b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC emissions, in pounds per day [i.e. the sum of (b x d) for all sealants employed].
2. The permittee shall collect and record the following information each month for the sealant machine:
- a. The total sealant usage for the month, in gallons.
 - b. The total VOC emissions from all sealants employed, in tons [i.e. the sum of the daily VOC emissions as recorded in Section C.1.e. above, divided by 2000 lbs/ton].
3. The permittee shall collect and record the following information each month for the entire facility:
- a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
 - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P031) was evaluated based on the actual materials (typically coatings and cleanup 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 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" pollutants:

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1036

MAGLC (ug/m³): 14,042

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 still 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.

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.

5. 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".

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 the following:
 - a. An identification of each day during which the daily VOC emission rate exceeded the 26.24 lbs/day emission limitation, and the actual daily VOC emission rate for each such day.
 - b. An identification of each day during which the daily sealant usage exceeded the 4.5 gallon/day maximum sealant usage limitation, and the actual daily sealant usage for each such day.
 - c. An identification of each month during which the rolling, 12-month VOC emission rate exceeded the 3.29 TPY rolling, 12-month VOC emission limitation, and the actual rolling, 12-month VOC emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month sealant usage exceeded the 1125 gallons/yr rolling, 12-month sealant usage limitation, and the actual rolling, 12-month sealant usage for each such month.
 - e. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - f. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
2. 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.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
4. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage for this emissions unit.
 - b. The VOC emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. 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 26.24 lbs/day

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 3.29 TPY, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

Emission Limitation -
The sealant usage employed in this emissions unit shall not exceed 4.5 gallon/day (32.8 lbs).

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

Emission Limitation -
The sealant usage employed in this emissions unit shall not exceed 1125 gallons/year (8213 lbs), as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

Emission Limitation -
The VOC/gallon content of the sealant shall not exceed 5.84 lbs VOC/gallon
The MEK content of the sealant shall not exceed 5.84 lbs MEK/gallon

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit. 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. Emission Limitation -
Any individual HAP from this facility shall be less than 9.9 TPY, as a rolling, 12-month summation
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data
- Emission Limitation -
The total combined HAPs from this facility shall be less than 24.9 TPY, as a rolling, 12-month summation
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.

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Facility ID: 0819070018 Emissions Unit ID: P041 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
P041 - Sealing Compound Machine No. 6- Heavy Duty West	OAC rule 3745-31-02(A)(2) (PTI 08-04324)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 46.72 pounds per day (lbs/day)*.
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	The maximum daily sealant usage shall not exceed 8 gallons (58.4 lbs). The VOC emissions from this emissions unit shall not exceed 5.84 TPY, as a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(e)	The sealant employed in this emissions unit shall not exceed 2000 gallons (11,680 lbs) per year, as a rolling, 12-month summation. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

* All VOC for this emissions unit is methyl ethyl ketone (MEK). Therefore it is not necessary for the permittee to maintain records of the combined HAP emissions for this emissions unit.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.

3. The maximum daily sealant usage shall not exceed 8 gallons (58.4 lbs).
 4. The annual sealant usage shall not exceed 2000 gallons (11,680 lbs), as a rolling, 12-month summation.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC emissions, in pounds per day [i.e. the sum of (b x d) for all sealants employed].
 2. The permittee shall collect and record the following information each month for the sealant machine:
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC emissions from all sealants employed, in tons [i.e. the sum of the daily VOC emissions as recorded in Section C.1.e. above, divided by 2000 lbs/ton].
 3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
 - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.
 4. The permit to install for this emissions unit (P041) was evaluated based on the actual materials (typically coatings and cleanup 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 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" pollutants:

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1036

MAGLC (ug/m3): 14,042

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 still 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.
 - 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.

5. 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".
 - 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 the following:
 - a. An identification of each day during which the daily VOC emission rate exceeded the 46.72 lbs/day emission limitation, and the actual daily VOC emission rate for each such day.
 - b. An identification of each day during which the daily sealant usage exceeded the 8 gallon/day maximum sealant usage limitation, and the actual daily sealant usage for each such day.
 - c. An identification of each month during which the rolling, 12-month VOC emission rate exceeded the 5.84 TPY rolling, 12-month VOC emission limitation, and the actual rolling, 12-month VOC emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month sealant usage exceeded the 2000 gallons/yr rolling, 12-month sealant usage limitation, and the actual rolling, 12-month sealant usage for each such month.
 - e. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - f. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
2. 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.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
4. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage for this emissions unit.
 - b. The VOC emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. 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 46.72 lbs/day

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 5.84 TPY, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

Emission Limitation -
The sealant usage employed in this emissions unit shall not exceed 8 gallons/day (58.4 lbs)

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

Emission Limitation -
The sealant usage employed in this emissions unit shall not exceed 2000 gallons/year (11,680 lbs), as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

Emission Limitation -
The VOC/gallon content of the sealant shall not exceed 5.84 lbs VOC/gallon

The MEK content of the sealant shall not exceed 5.84 lbs MEK/gallon

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit. 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.

Emission Limitation -

Any individual HAP from this facility shall be less than 9.9 TPY, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data

Emission Limitation -

The total combined HAPs from this facility shall be less than 24.9 TPY, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

F. **Miscellaneous Requirements**

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.