Facility ID: 0819070244 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 K001
Go to Part II for Emissions Unit K002

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Facility ID: 0819070244 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Spray Coating Booth No. 1 with dry filtration system	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions shall not exceed 66.24 lbs/day, excluding cleanup and 12.16 TPY, including cleanup.
	OAC rule 3745-21-09(U)(2)(e)(iii)	The coating usage rate shall be less than or equal to 10 gallons per day.

2. **Additional Terms and Conditions**

   (a) The 66.24 lbs VOC/day emission 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.

B. **Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 10 gallons per day.

2. The permittee shall operate the dry filter system for control of particulate emissions whenever this emission unit is in operation.

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

1. The permittee shall collect and record the following information each day for the coating line:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

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 cleanup material employed.

   b. The number of gallons of each coating material employed

   c. The number of gallons of each cleanup material employed.

   d. The number of gallons of cleanup materials recovered for recycling or treatment.

   e. The VOC content of each cleanup material, in pounds per gallon.

   f. The VOC content of each coating, as applied, in pounds per gallon.

   g. The VOC emission rate from cleanup materials, in pounds, i.e., (c - d) x (e) for cleanup materials employed.

   h. The VOC emission rate from all coatings materials, in pounds, i.e., (b x f) for coatings employed.

i. The total VOC emissions rate from all coatings and cleanup materials, in pounds and tons, i.e., (g + h).

3. The permit to install for emission units K001 and K002 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" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 7.36

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3846

MAGLC (ug/m3): 4485.2
Pollutant: Xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 5.38

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2810

MAGLC (ug/m3): 10337.9

Pollutant: ethylbenzene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 1.54

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 804.6

MAGLC (ug/m3): 10337.9

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level 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".

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 record showing the dry filtration system was not in service when this emissions unit was in operation. 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 45 days after the event occurs.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total VOC emissions, in tons. 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 specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

a. Emission Limitation -
less than or equal to 10 gallons/day coating usage

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

b. Emission Limitation -
66.24 lb/day VOC , excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum allowable daily coating material usage of 10 gallon/day by the maximum VOC content of the coating.

c. Emission Limitation -
12.16 TPY VOC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the montly VOC emission rates.

d. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coating and cleanup materials.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 0819070244 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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 - Spray Coating Booth No. 2 with dry filtration system	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions shall not exceed 66.24 lbs/day, excluding cleanup and 12.16 TPY, including cleanup.
	OAC rule 3745-21-09(U)(2)(e)(iii)	The coating usage rate shall be less than or equal to 10 gallons per day.

2. **Additional Terms and Conditions**

(a) The 66.24 lbs VOC/day emission 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.

B. **Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 10 gallons per day.

2. The permittee shall operate the dry filter system for control of particulate emissions whenever this emission unit is in operation.

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

1. The permittee shall collect and record the following information each day for the coating line:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

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 cleanup material employed.

   b. The number of gallons of each coating material employed

   c. The number of gallons of each cleanup material employed.

   d. The number of gallons of cleanup materials recovered for recycling or treatment.

   e. The VOC content of each cleanup material, in pounds per gallon.

   f. The VOC content of each coating, as applied, in pounds per gallon.

   g. The VOC emission rate from cleanup materials, in pounds, i.e., (c - d) x (e) for cleanup materials employed.

   h. The VOC emission rate from all coatings materials, in pounds, i.e., (b x f) for coatings employed.

   i. The total VOC emissions rate from all coatings and cleanup materials, in pounds and tons, i.e., (g + h).

3. The permit to install for emission units K001 and K002 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" pollutant(s):

   Pollutant: Toluene

   TLV (mg/m3): 188.4

   Maximum Hourly Emission Rate (lbs/hr): 7.36

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 3846

   MAGLC (ug/m3): 4485.2
   Pollutant: Xylene

   TLV (mg/m3): 434.2

   Maximum Hourly Emission Rate (lbs/hr): 5.38

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 2810

   MAGLC (ug/m3): 10337.9

   Pollutant: ethylbenzene

   TLV (mg/m3): 434.2

   Maximum Hourly Emission Rate (lbs/hr): 1.54

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 804.6

   MAGLC (ug/m3): 10337.9

   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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level 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".

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 record showing the dry filtration system was not in service when this emissions unit was in operation. 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 45 days after the event occurs.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total VOC emissions, in tons. 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 specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

a. Emission Limitation -
less than or equal to 10 gallons/day coating usage

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

b. Emission Limitation -
66.24 lb/day VOC , excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum allowable daily coating material usage of 10 gallon/day by the maximum VOC content of the coating.

c. Emission Limitation -
12.16 TPY VOC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the montly VOC emission rates.

d. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coating and cleanup materials.

F. **Miscellaneous Requirements**

1. None