

Facility ID: 0855140460 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: 0855140460 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
PVC coating spray line with curing oven, thermal incinerator control	OAC rule 3745-31-05 PTI 08-3348	2,366 lbs/month, and 14.2 tons/year volatile organic compounds (VOC) 0.50 lb VOC/gallon PVC coating, excluding water and exempt solvents (before control) 6.6 lbs VOC/gallon mineral spirits See A.2.a. below
	OAC rule 3745-21-09(U)(1)(c)	less stringent than the VOC content limitation above

2. **Additional Terms and Conditions**
 - (a) The VOC emissions from the curing oven included with this emissions unit K002 shall be controlled through the application of a thermal incinerator operating at a minimum destruction efficiency of 90%.

B. Operational Restrictions

1. The maximum monthly PVC coating usage for this emissions unit shall not exceed 10,000 gallons, excluding water and exempt solvents.
2. The maximum monthly mineral spirits cleanup material usage for this emissions unit shall not exceed 200 gallons.
3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain monthly records which include the following information for each material employed in the coating line:
 - a. The company identification of each coating and mineral spirits cleanup material employed.
 - b. The number of gallons of each coating (excluding water and exempt solvents) and mineral spirits cleanup material employed.

- c. The number of gallons of all coatings (excluding water and exempt solvents) and mineral spirits cleanup materials employed.
- d. The volatile organic compound (VOC) content of each coating employed, in pounds per gallon excluding water and exempt solvents, and mineral spirits cleanup material employed, in pounds per gallon.
- e. The number of gallons of each coating (excluding water and exempt solvents) recovered and shipped off site for recycling.
- f. The number of gallons of all coatings (excluding water and exempt solvents) recovered and shipped off site for recycling.
- g. The total controlled VOC emission rate from all coatings and mineral spirits cleanup materials employed, in pounds (see calculation methodology in section E.1a).

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and/or mineral spirits cleanup materials (i.e., for VOC content). 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.
2. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) which include the following information for this emissions unit:
 - a. An identification of each month during which the monthly usage rate exceeds 10,000 gallons, excluding water and exempt solvents, of PVC coating and/or 200 gallons of mineral spirits cleanup material, and the actual usage rate for each such month.
 - b. An identification of each month during which the VOC emissions exceeded 2,336 pounds.
 - c. An identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which summarize the following information for the previous calendar year: company identification of each coating material employed, the total number of gallons of coatings and mineral spirits cleanup materials employed, the VOC content (in pounds VOC per gallon, excluding water and employed exempt solvents) of each coating, and the total VOC emissions from the emissions unit. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation:
2366 lbs VOC/month

Applicable Compliance Method:
Compliance shall be determined by the following calculation method:
 - i. The number of gallons of the coatings employed on the parts, as recorded in section C.3.c shall be multiplied by the maximum VOC content of 0.5 lb VOC/gallon, excluding water and exempt solvents.
 - ii. The number of gallons of coatings recovered and shipped off site for recycling, as recorded in section C.3.f shall be multiplied by a company derived solvent loss factor of 0.04 lb VOC/gallon of coating recovered.
 - iii. The number of gallons of mineral spirits employed, as recorded in section C.3.c shall be multiplied by the maximum VOC content of 6.60 lbs VOC/gallon.
 - iv. The uncontrolled VOC emission rate, the sum of (i) and (iii), shall be multiplied by an overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance. Until additional tests are conducted, an average overall control efficiency of 36% (0.36) shall be used in this calculation.
 - v. The total monthly VOC emission rate shall be the sum of (ii) and (iv).
 Emission Limitation:
14.2 tons/year VOC

Applicable Compliance Method:
Compliance shall be based on record keeping as specified in C.3 and shall be the sum of the twelve monthly VOC emission rates for the calendar year divided by 2,000 pounds per ton.
Emission Limitations:
0.5 lb VOC/gallon coating
6.6 lb VOC/gallon mineral spirits

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above VOC limitations based upon the record keeping requirements in section C of this permit.

The permittee shall use USEPA Method 24 to determine the VOC contents for coatings. 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 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.
Emission Limitations:
10,000 gallons/month PVC coating usage
200 gallons/month mineral spirits cleanup material

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section C of this permit.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the minimum destruction efficiency of 90% for the thermal incinerator.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 25 as specified in 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- F. Miscellaneous Requirements**
1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.