

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: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(K001) - E-coat line with 2 ovens	OAC rule 3745-31-05(A)(3) PTI 08-04819	The requirements established pursuant to this rule also includes compliance with the requirement of OAC rule 3745-31-05(C). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 7.7 lbs/hr. The VOC content of the resin shall not exceed 0.4 pound of VOC per gallon. The VOC content of the paste shall not exceed 0.4 pound of VOC per gallon.
	OAC rule 3745-21-09(U)(1)(c)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment NSR and Title V permitting requirements)	The VOC emission rate from this emissions unit shall not exceed 33.73 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. **Additional Terms and Conditions**
 - (b) The use of cleanup material other than water is prohibited in this emissions unit.

B. Operational Restrictions

1. The emissions of VOC from this emissions unit shall not exceed 33.73 tons per year, based upon a rolling, 12-month summation of the monthly emissions. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emissions, upon issuance of this permit.
2. The maximum annual resin usage rate shall not exceed 134,904 gallons based on a rolling, 12-month summation of the monthly resin usage rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the resin usage rate, upon issuance of this permit.
3. The maximum annual paste usage rate shall not exceed 33,726 gallons based on a rolling, 12-month summation of the monthly paste usage rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the paste usage rate, upon issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each material added to the electro deposition dip tank, as applied (resin and paste).
 - b. The number of gallons of each material added to the electro deposition dip tank i.e. resin and paste, as

applied.

- c. The VOC content of each paste, as applied.
- d. The VOC content of each resin, as applied.
- e. The monthly VOC mass emissions rate, in tons.
- f. The rolling, 12-month summation of the monthly resin usage, in gallons.
- g. The rolling, 12-month summation of the monthly paste usage, in gallons.
- h. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e., (g x c) + (f x d) divided by 2000 lbs/ton.

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 E-coat concentrate, consisting of resin and paste, 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. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of month during which the rolling, 12- month usage limitations for resin and paste exceeded 134,904 gallons and 33,726 gallons respectively.
 - b. an identification of month during which the rolling, 12- month emissions limitation for VOC exceeded 33.73 tons per year.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA 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 deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. 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 for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation-
The VOC emissions from this emissions unit shall not exceed 7.7 lbs/hr.

Applicable Compliance Method-
Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emission Limitation -
The VOC emission rate from this emissions unit shall not exceed 33.73 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method -
Compliance shall be based on record keeping as specified in Section C.1.h.

Emission Limitation-
The VOC content of the resin and paste shall not exceed 0.4 pound of VOC per gallon respectively.

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the 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.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

F. Miscellaneous Requirements

1. None