

Facility ID: 0855140498 Issuance type: Final State Permit To Operate

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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: 0855140498 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>
No.1 egan coating line	OAC rule 3745-31-05(A)(3) PTI 08-04713	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.89 pounds per hour (lbs/hr), excluding cleanup. The VOC emissions from this emissions unit shall not exceed 8.28 tons per rolling 12 month summation, including cleanup. See A.2.a, B.1., and B.2. The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-35-07(B), 3745-21-09(F), 3745-21-09(B)(6) and 40 CFR Part 60, Subpart RR.
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (synthetic minor to avoid PSD and Title V)	The total allowable emissions of VOC from emissions units K002, K003, K004, K005, K006, and K007 shall not exceed 70.13 tons per rolling 12 month summation, including cleanup. The total allowable emissions of individual hazardous air pollutant (HAP) emissions from emissions units K002, K003, K004, K005, K006, and K007 shall not exceed 9.9 tons per rolling 12 month summation, including cleanup.
		The total allowable emissions of combined hazardous air pollutant (HAP) emissions from emissions units K002, K003, K004, K005, K006, and K007 shall not exceed 24.9 tons per rolling 12 month summation, including cleanup.
	OAC rule 3745-21-09(F) 40 CFR Part 60, Subpart RR	The VOC content shall not exceed 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents. The VOC content shall not exceed 0.2 kilogram (kg)/kg of coating solids as calculated on a weighted average basis for each calendar month.

2. **Additional Terms and Conditions**
 - (a) The 1.89 pounds VOC per hour emission limit was established for PTI purposes to reflect the potential to emit for the 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 maximum annual volatile organic material usage for emission units K002, K003, K004, K005, K006 and K007

shall not exceed 70.13 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

2. The maximum annual HAPs material usage for emission units K002, K003, K004, K005, K006 and K007 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAPs material usage figures from a combination of coatings and cleanup.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation from the facility.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month that this emissions unit is operating:
 - a. The name and identification of each surface coating and cleanup material employed.
 - b. The number of gallons of each surface coating and cleanup material employed.
 - c. The weight, in pound per month, of each surface coating and cleanup material employed, as applied.
 - d. The VOC content for each surface coating and cleanup material employed, in pounds per gallon.
 - e. The VOC content for each surface coating and cleanup material, as applied, in percent by weight.
 - f. The VOC content of each surface coating employed, in pounds per gallon (excluding water and exempt solvents).
 - g. The individual HAP content for each surface coating and cleanup material employed, in pounds per gallon.
 - h. The combined HAP content for each surface coating and cleanup material employed, in pounds per gallon.
 - i. The total volatile organic material usage from all surface coating and cleanup material, in pounds.
 - j. The VOC emission rate from each surface coating and cleanup material employed (b x d), in pounds.
 - k. The individual HAP emission rate from each surface coating and cleanup material employed (b x g), in pounds.
 - l. The combined HAP emission rate from each surface coating and cleanup material employed (b x h), in pounds.
 - m. The total VOC emissions from all coatings and cleanup materials employed, in pounds.
 - n. The total individual HAP emissions from all coatings and cleanup material employed, in pounds.
 - o. The total combined HAP emissions from all coatings and cleanup material employed, in pounds.
 - p. The rolling, 12-month summation of the volatile organic material usage from all surface coating and cleanup materials.
 - q. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons, i.e., the summation of (m) for the previous 12-month period divided by 2000 lbs/ton.
 - r. The rolling, 12-month summation of the individual HAP emissions from this emissions unit, in tons, i.e., the summation of (n) for the previous 12-month period divided by 2000 lbs/ton.
 - s. The rolling, 12-month summation of the combined HAP emissions from this emissions unit, in tons, i.e., the summation of (o) for the previous 12-month period divided by 2000 lbs/ton.
2. The permittee shall collect and record the following information for each month that this emissions unit is operating:
 - a. The company identification of each surface coating employed.
 - b. The number of gallons of each surface coating employed.
 - c. The VOC content for each surface coating employed, in pounds per gallon.
 - d. The VOC content for each surface coating employed, in pounds per gallon, excluding water and exempt solvents.
 - e. The VOC content for each surface coating employed, in kilograms per gallon ((c.)/2.20 lbs/kg).
 - f. The total mass of VOC applied, in kilograms (the sum of (e) x (b) for all coatings applied).
 - g. The solids content for each surface coating employed, in pounds per gallon.
 - h. The solids content for each surface coating employed, in pounds per gallon kilograms per gallon ((g.)/2.20

lbs/kg).

i. The total mass of solids applied, in kilograms (the sum of the product (h) x (b) for all coatings applied).

j. The VOC emissions, in kg VOC/kg solids ((f)/(i)).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC emissions, in tons, from all emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each month during which the rolling, 12-month volatile organic material usage and/or VOC emissions exceeded the 70.13 TPY rolling, 12-month facility volatile organic material usage and/or VOC emission limitations, and the actual rolling, 12-month volatile organic material usage and/or VOC emission rates for each such month.
 - b. 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.
 - c. 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.
 - d. Any monthly record showing the use of noncomplying coatings pursuant to the requirements in 40 CFR Part 60, Subpart RR.

These quarterly deviation reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.
3. Pursuant to reporting requirements in OAC rule 3745-21-09(B), 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. 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.

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:

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 1.89 pounds per hour, excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly coating usage rate (13.5 gals ctg) by the maximum VOC content (0.14 lbs VOC/gal ctg).

Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 8.28 tons per rolling 12-month summation, including cleanup

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

Emission Limitation -
The individual HAP emission from this emissions unit shall not exceed 9.9 TPY, based on a 12-month rolling summation

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

Emission Limitation-
The combination of HAPs from this emissions unit shall not exceed 24.9 TPY, based on a 12-month rolling summation

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

Emission Limitation-
The VOC content shall not exceed 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents, when operating without the use of a control system.

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

Emission Limitation-
The VOC content shall not exceed 0.20 kg/kg of coating solids as calculated on a weighted average basis for each calendar month, when operating without the use of a control system.

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

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: Sections A.1 (only the requirements associated with OAC 3745-35-07(B) and 40 CFR Part 60, Subpart RR), B.1 and 2, C.1 and 2., D.1 and 2, E.1.c and d.