Facility ID: 0857023339 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: 0857023339 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 - manual spray paint booth with dry filtration system and electric drying oven	OAC rule 3745-21-09(U)(2)(e)(i) PTI 08-04889	The coating usage shall be less than or equal to 8 gallons per day. See A.2.a.
	OAC rule 3745-31-05(A)(3)(b)	The uncontrolled potential to emit for OC emissions from this emissions unit is less than ten tons per year. See A.2.b.
	OAC rule 3745-114-01 and ORC 3704.03(F)	See section C.3.

2. **Additional Terms and Conditions**

   (a) OAC rule 3745-21-09(U)(2)(e)(i) specifies a coating usage limitation when coating metal parts. By limiting coating usage to the 8 gal/day limitation cited under this rule when the source is coating either plastic or metal parts and specifying daily monitoring and record keeping, it was determined that separate recordkeeping when coating non-metal versus metal parts would not be necessary.
   The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. **Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

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

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

   a. the company identification for each coating and cleanup material employed;

   b. the number of gallons of each coating and cleanup material employed;

   c. the organic compound content of each coating and cleanup material, in pounds per gallon; and

   d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day.

2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permit to install for emissions units K001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: xylene
   TLV (mg/m3): 434.19
   Maximum Hourly Emission Rate (lbs/hr): 1.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 420.92
MAGLC (ug/m3): 10,338
The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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; and

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.).

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 employed more than the applicable maximum daily coating usage limit of 8 gallons per day specified in Section A.1. above. 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 OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 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:
Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

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

2. 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 Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.

F. **Miscellaneous Requirements**

1. None