

Facility ID: 0857040931 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

- F001: Roadways and Parking Lots
- P003: Rubber Finishing
- P005: Drill and Tap Machines
- P006: Drill, Grind, & Scratch Machines
- P018: M/M RM Pressline #1
- P502: Mounts Pleb Insert Prep
- P505: Liteflex Springs Mfg. #1
- P506: Liteflex Springs Mfg. #2
- P507: Liteflex Springs Mfg. #3
- P508: Liteflex Springs Mfg. #4
- P509: Liteflex Springs Mfg. #5
- P510: Liteflex Springs Mfg. #6
- P511: Liteflex Springs R & D
- P512: Composite Material Product R & D
- P513: LS R/C Bulk Handling
- P514: Creel Room Fume Hood
- P515: Rubber Mills
- P516: Rubber Mixers
- P517: Carbon Black Silo
- P518: Grinders, Saws, and Filers
- P519: Grinders
- P520: Grinder
- P521: Grinder
- P522: Carpenter Shop
- Z001: Cold Cleaner
- Z002: Cold Cleaner
- Z003: Welding Station
- Z004: Abrasive Blast Booth
- Z005: Machining Equipment
- Z006: Cold Cleaners
- Z007: Weld Shop
- Z008: Cold Cleaners
- Z009: Rubber Presses
- Z010: Crimping Machines
- Z011: Robot Assembly
- Z012: Drilling Cells
- Z013: Cure Oven
- Z014: Epoxy Dispensing
- Z015: Cold Cleaner
- Z016: Dip Tank
- Z017: Rivet Station
- Z018: Solvent Tank
- Z019: AQ Primer
- Z020: AQ Primer
- Z021: Test Stand
- Z022: Glue Pump Station
- Z023: Grit Blaster
- Z024: Rubber Press
- Z025: Machining Equipment

Z026: Scratch Brush Stations/Grinders
 Z028: Solvent Cleaners
 Z029: Welding
 Z030: Basement Tool and Model Shop
 Z031: Engine Mount Test Lab
 Z032: Solvent Cleaner
 Z033: Basement Testing Area
 Z034: Grinder
 Z035: Solvent Cleaners
 Z036: Lab Paint Booth
 Z037: Rubber Presses
 Z039: Lift Truck Repair Room
 Z040: Solvent Cleaner
 Z041: Grinding Station
 Z042: Natural Gas Fired Heating System
 Z043: Rubber Presses
 Z044: Assembly
 Z045: Ransohoff Washing Unit
 Z046: Lab Dieffenbacher Press
 Z047: Mount Prototype Lab
 Z048: Autophoretic Coating Line
 Z049: Multipress
 Z050: #1 Desma Inject Unit
 Z051: PH Dial Table North J Torque Strut
 Z052: Mobile Spray Unit 2
 Z053: Labeling System
 Z054: Solvent Cleaner
 Z056: Portable Fuel Container
 Z057: Alkaline Etch
 Z058: Electric Oven
 Z059: Phosphating Line and Sludge Tank
 Z060: Abrasive Blasting Blaster
 Z061: Parts Washer
 Z062: Paint Dobber
 Z063: Omega Bolt Stakers
 Z064: Wastewater Treatment Operations
 Z065: Gear Oil Storage
 Z066: Pin Insert Assembly
 Z067: Strut Dial Assembly
 Z068: Dial Staker
 Z069: PH Press Conveyors
 Z070: Rubber Presses
 Z071: Drills, Lathes, & Sanders
 Z072: Epoxy Curative Tank
 Z073: Epoxy Resin Tank
 Z074: Saws
 Z075: Machining Operations
 Z076: Radial Saw
 Z077: Grinding Operations
 Z078: Machining Operations in Re-Op Area
 Z079: Gear Oil Tanks
 Z080: Solvent Cleaners
 Z081: Cabosil Mix Area
 Z082: Maintenance Solvent Cleaners
 Z083: Solvent Cleaners
 Z084: Fire Suppression System
 Z085: AQ Primer
 Z086: AQ Primer

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the source(s).
3. This permittee is hereby notified that this permit and all Agency records concerning the operation of these permitted emissions units are subject to public disclosure in accordance with OAC rule 3745-49-03.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857040931 Emissions Unit ID: B505 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
natural gas-fired boiler; 54.4 mmBtu/hr maximum heat input	OAC rule 3745-31-05(A)(3) PTI #08-4035	particulate emissions (PE): 4.77 TPY sulfur dioxide (SO2): 0.0006 lb/mmBtu of actual heat input; 0.14 TPY nitrogen oxides (NOx): 0.08 lb/mmBtu of actual heat input; 19.1 TPY volatile organic compounds (VOC): 0.0055 lb/mmBtu of actual heat input; 1.31 TPY carbon monoxide (CO): 0.073 lb/mmBtu of actual heat input; 17.4 TPY Visible emissions shall not exceed 10% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirement of OAC rule 3745-17-10(B)(1). 0.020 pound of PE per mmBtu of actual heat input The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3). exempt (See Section A.II.1.)
	OAC rule 3745-17-10 (B)(1) OAC rule 3745-17-07 (A)	
	40 CFR, Part 60, Subpart Dc	

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation-
4.77 TPY PE

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- b. Emission Limitation-
0.0006 pound SO₂/mmBtu of actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 pound SO₂/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Method 6 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation-
0.14 TPY SO₂

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- d. Emission Limitation-
0.08 lb NO_x/mmBtu

Applicable Compliance Method-

The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation-
19.1 TPY NO_x

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- f. Emission Limitation-
0.0055 pound VOC/mmBtu of actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-3 (revised 2/98) of 5.5 pounds VOC/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

- g. Emission Limitation-
1.31 TPY VOC

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the

lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- h. Emission Limitation-
0.073 pound CO/mmBtu of actual heat input
- Applicable Compliance Method-
Compliance shall be based upon a manufacturer-guaranteed emission factor of 0.073 lb CO/mmBtu of actual heat input.
- If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.
- i. Emission Limitation-
17.4 TPY CO
- Applicable Compliance Method-
Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).
- j. Emission Limitation-
Visible emissions shall not exceed 10% opacity, as a 6-minute average.
- Applicable Compliance Method-
If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
- k. Emission Limitation-
0.020 lb PE per mmBtu actual heat input
- Applicable Compliance Method-
The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).
- If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).
2. Approximately 2.5 years after permit issuance and within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit to demonstrate compliance with the allowable mass emissions rate for NOx. The emissions test(s) shall be conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
3. Not later than 30 days prior to the proposed test date(s), this facility 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 assure that the emissions unit operation and 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: B505 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857040931 Emissions Unit ID: B506 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
natural gas-fired boiler; 54.4 mmBtu/hr maximum heat input	OAC rule 3745-31-05(A)(3) PTI #08-4035	particulate emissions (PE): 4.77 TPY sulfur dioxide (SO ₂): 0.0006 lb/mmBtu of actual heat input; 0.14 TPY nitrogen oxides (NO _x): 0.08 lb/mmBtu of actual heat input; 19.1 TPY volatile organic compounds (VOC): 0.0055 lb/mmBtu of actual heat input; 1.31 TPY carbon monoxide (CO): 0.073 lb/mmBtu of actual heat input; 17.4 TPY Visible emissions shall not exceed 10% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirement of OAC rule 3745-17-10(B)(1). 0.020 pound of PE per mmBtu of actual heat input The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3). exempt (See Section A.II.1.)
	OAC rule 3745-17-10 (B)(1) OAC rule 3745-17-07 (A)	
	40 CFR, Part 60, Subpart Dc	

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
4.77 TPY PE

Applicable Compliance Method-
Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- b. Emission Limitation-
0.0006 pound SO₂/mmBtu of actual heat input
- Applicable Compliance Method-
The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 pound SO₂/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).
- If required, the permittee shall demonstrate compliance in accordance with Method 6 of 40 CFR, Part 60, Appendix A.
- c. Emission Limitation-
0.14 TPY SO₂
- Applicable Compliance Method-
- Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).
- d. Emission Limitation-
0.08 lb NO_x/mmBtu
- Applicable Compliance Method-
The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.
- e. Emission Limitation-
19.1 TPY NO_x
- Applicable Compliance Method-
Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).
- f. Emission Limitation-
0.0055 pound VOC/mmBtu of actual heat input
- Applicable Compliance Method-
The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-3 (revised 2/98) of 5.5 pounds VOC/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).
- If required, the permittee shall demonstrate compliance in accordance with Method 25 of 40 CFR, Part 60, Appendix A.
- g. Emission Limitation-
1.31 TPY VOC
- Applicable Compliance Method-
Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).
- h. Emission Limitation-
0.073 pound CO/mmBtu of actual heat input
- Applicable Compliance Method-
Compliance shall be based upon a manufacturer-guaranteed emission factor of 0.073 lb CO/mmBtu of actual heat input.
- If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.
- i. Emission Limitation-
17.4 TPY CO
- Applicable Compliance Method-
Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).
- j. Emission Limitation-
Visible emissions shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method-
If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- k. Emission Limitation-
0.020 lb PE per mmBtu actual heat input

Applicable Compliance Method-
The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- 2. Approximately 2.5 years after permit issuance and within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit to demonstrate compliance with the allowable mass emissions rate for NOx. The emissions test(s) shall be conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 3. Not later than 30 days prior to the proposed test date(s), this facility 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 assure that the emissions unit operation and 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: B506 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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- 2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K007 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
dipline A and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	1,582 lbs/month and 9.49 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.1.2.a., A.1.2.b. and A.1.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-

31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******II. Operational Restrictions**

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall calculate and record each month the total VOC emission rate, in pounds, for this emissions unit (the monthly VOC emission rate shall be calculated by summing the daily VOC emission rates, from Section 1.g above, for the calendar month).
3. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
4. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
5. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
6. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
7. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and

- d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each month during which the total controlled VOC emission rate for this emissions unit exceeded the allowable monthly emission limit of 1,582 lbs, and the actual monthly VOC emission rate for each such month;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1,582 lbs/month VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Sections III.1. and III.2. of this permit.
 - b. Emission Limitation -
9.49 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.2. of this permit and shall be the summation of the monthly VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of

this permit.

- e. Emission Limitations:
- 90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system
 - 91.2% VOC removal efficiency for the fume concentrator wheel
 - 98.5% VOC destruction efficiency for the catalytic incinerator
- Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K007 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K008 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
dipline B and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	815 lbs/month and 4.89 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. **Additional Terms and Conditions**

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. **Operational Restrictions**

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show

that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.

4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall calculate and record each month the total VOC emission rate, in pounds, for this emissions unit (the monthly VOC emission rate shall be calculated by summing the daily VOC emission rates, from Section 1.g above, for the calendar month).
3. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
4. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
5. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

6. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
7. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each month during which the total controlled VOC emission rate for this emissions unit exceeded the allowable monthly emission limit of 1,582 lbs, and the actual monthly VOC emission rate for each such month;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
815 lbs/month VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -

- Compliance shall be based upon the record keeping requirement specified in Sections III.1. and III.2. of this permit.
- b. Emission Limitation -
4.89 TPY VOC, including cleanup (for this emissions unit)
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.2. of this permit and shall be the summation of the monthly VOC emission rates for the calendar year, divided by 2000.
- c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3 of this permit.
- d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
- e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system
- 91.2% VOC removal efficiency for the fume concentrator wheel
- 98.5% VOC destruction efficiency for the catalytic incinerator
- Applicable Compliance Method -
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
- c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
- i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
- ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K008 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K009 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
COE line #1 A and 2 ovens, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	53.93 lbs/day and 9.84 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.1.2.a., A.1.2.b. and A.1.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

- 1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

- c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.
By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.
- * Definitions for PTE and NDO:
- Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.
- Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
 - 3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
 - 4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
 - 5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
 - 6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
- 2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:

- a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.
- Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 53.93 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was

- in compliance; and
- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
53.93 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
9.84 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.

- i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K009 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857040931 Emissions Unit ID: K010 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
COE line #1 B and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	29.74 lbs/day and 5.43 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume

concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.

- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

- a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
- a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.
- Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 29.74 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
29.74 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
5.43 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-

Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K010 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K011 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
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COE line #1 B and 2 ovens, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator

OAC rule 3745-31-05(A)(3)
PTI # 08-3513

OAC rule 3745-31-05(D)
PTI # 08-3513

OAC rule 3745-21-09(B)(6)

Measures

53.93 lbs/day and 9.84 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)

390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup

39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup

See Sections A.I.2.a., A.I.2.b. and A.I.2.c.
The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

- 1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
- 3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
- 4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent

performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.

5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 53.93 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
53.93 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
9.84 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015

- and K017, combined, including cleanup
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
- d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
- e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system
- 91.2% VOC removal efficiency for the fume concentrator wheel
- 98.5% VOC destruction efficiency for the catalytic incinerator
- Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
- c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
- i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
- ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.
- 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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K011 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K012 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
COE line #3 A/ #3 B and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	53.48 lbs/day and 10.86 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup 39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 53.48 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
53.48 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
10.86 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method -
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and

their total concentration, and on consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K012 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K013 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
COE line #4 and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	33.20 lbs/day and 6.06TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.1.2.a., A.1.2.b. and A.1.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and

- g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
- a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
- b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
- b. the temperature immediately upstream of the incinerator's catalyst bed; and
- c. the temperature immediately downstream of the incinerator's catalyst bed.
- Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
- d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
- a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 33.20 lbs, and the actual daily VOC emission rate for each such day;
- b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;

- c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
33.20 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
6.06 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

- None

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Facility ID: 0857040931 Emissions Unit ID: K013 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 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> |
|----|---|--------------------------------------|--|
| 2. | Additional Terms and Conditions | | |
| 1. | None | | |

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K014 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
COE line #5 and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	33.20 lbs/day and 6.06TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and

K017, combined, including cleanup

See Sections A.I.2.a., A.I.2.b. and A.I.2.c.

OAC rule 3745-21-09(B)(6)

The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference

during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

- c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
- d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 33.20 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
33.20 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
6.06 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.

- e. Emission Limitations:
- 90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system
 - 91.2% VOC removal efficiency for the fume concentrator wheel
 - 98.5% VOC destruction efficiency for the catalytic incinerator
- Applicable Compliance Method -
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0857040931 Emissions Unit ID: K014 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0857040931 Emissions Unit ID: K015 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
manual dip tank and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	2,238 lbs/month and 13.43TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.

3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall calculate and record each month the total VOC emission rate, in pounds, for this emissions unit (the monthly VOC emission rate shall be calculated by summing the daily VOC emission rates, from Section 1.g above, for the calendar month).
3. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
4. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
5. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

- The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
6. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
 7. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each month during which the total controlled VOC emission rate for this emissions unit exceeded the allowable monthly emission limit of 2,238 lbs, and the actual monthly VOC emission rate for each such month;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -

- 2,238 lbs/month VOC, including cleanup (for this emissions unit)
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Sections III.1. and III.2. of this permit.
- b. Emission Limitation -
13.43 TPY VOC, including cleanup (for this emissions unit)
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.2. of this permit and shall be the summation of the monthly VOC emission rates for the calendar year, divided by 2000.
- c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
- d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup
- Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
- e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system
91.2% VOC removal efficiency for the fume concentrator wheel
98.5% VOC destruction efficiency for the catalytic incinerator
- Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
- c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
- i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
- ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s)

who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K015 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K017 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
adhesive mixing room, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	3 lbs/day and 0.55 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. **Additional Terms and Conditions**

- a. The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- b. The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- c. The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

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II. **Operational Restrictions**

- 1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;

- b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
 3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
 4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
 5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
 6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate x 0.01) for all the coatings and cleanup materials employed, i.e., (the summation of (b x c) for all coatings x 0.01)+ (the summation of (d x e) for all cleanup materials x 0.01*), in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]

- * Emissions unit K017 is employed as a mixing room for all the coatings employed in emissions units K007 through K015. Therefore, to ensure compliance with the overall usage limitation developed under OAC rule 3745-31-05(D), VOC usage for K017 is accounted for as material lost in the mixing process. Based on AP-42, Section 6.4.1 (revised 5/83), 0.01 of the total solvent employed in paint manufacture is lost.
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
 3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
 4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.
 5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 3 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section

- A.III.4 of this permit;
- e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
3 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - b. Emission Limitation -
0.55 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - d. Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - e. Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method -
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. 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 approximately 2.5 years after permit issuance and within 6

months prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.

c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.

i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and

ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: K017 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: K018 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
maintenance paint booth, miscellaneous metal parts	OAC rule 3745-31-05(A)(3) PTI # 08-2857	2.1 TPY volatile organic compounds (VOC), including emissions from cleanup materials
	OAC rule 3745-21-09(U)(2)(e)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e). less than or equal to 8 gallons of coatings usage per day

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. 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;
 - d. the VOC content of each coating employed, in pounds per gallon, as applied; and
 - e. the total VOC emissions from all the coatings employed, in pounds (i.e., the summation of (b x d) for all coatings).
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 cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material employed, in pounds per gallon;
 - d. the total VOC emissions from all the coatings employed (this is calculated by summing the daily VOC emission rates (from Section 1.e) for the calendar month), in pounds; and
 - e. the total VOC emissions from all the coatings and cleanup materials employed, in tons [i.e., (the summation of (III.2.b. x III.2.c) for all cleanup materials) + (the VOC emissions from all the coatings (from Section 2.d above)) divided by 2000].

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IV. Reporting Requirements

1. 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 restriction of 8 gallons. 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.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
2.1 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1 and III.2 and shall be the summation of the 12 monthly VOC emission rates for the calendar year.
 - b. Usage Restriction -
less than or equal to 8 gallons of coatings usage per day

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: P523 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
JR mount cell, front and rear, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC 2.5 lbs VOC/gallon of coating, excluding water and exempt solvents See A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulates
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- a. The permittee only employs water as cleanup material in this emissions unit.

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II. Operational Restrictions

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (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 45 days after the exceedance occurs.

3. 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 filter system was not in service when the 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 30 days after the event occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - b. Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - d. Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -
To determine the actual worst case emissions rate for particulates, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = particulates emission rate (lbs/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment
 - e. Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -
If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
2. USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: P523 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857040931 Emissions Unit ID: P524 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
RS rear mount cell, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC
		2.5 lbs VOC/gallon of coating, excluding water and exempt solvents
		See A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 lb/hour particulates 20% opacity, as a six-minute average, except as provided by rule

2. **Additional Terms and Conditions**

- a. The permittee only employs water as cleanup material in this emissions unit.

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II. **Operational Restrictions**

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (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 45 days after the exceedance occurs.
3. 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 filter system was not in service when the 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 30 days after the event occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - b. Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - d. Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -
To determine the actual worst case emissions rate for particulates, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$$

$$E = \text{particulates emission rate (lbs/hour)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$$

$$CE = \text{control efficiency of the control equipment}$$
 - e. Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -
If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
2. USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857040931 Emissions Unit ID: P524 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857040931 Emissions Unit ID: P525 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
RS front mount cell, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC 2.5 lbs VOC/gallon of coating, excluding water and

exempt solvents

See A.I.2.a.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).

OAC rule 3745-21-09 (U)(1)(d)

The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11(B)(1)

0.551 lb/hour particulates

OAC rule 3745-17-07(A)

20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- a. The permittee only employs water as cleanup material in this emissions unit.

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II. Operational Restrictions

- 1. The permittee shall operate the filter system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
- 2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
- 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (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 45 days after the exceedance occurs.
- 3. 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 filter system was not in service when the 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 30 days after the event occurs.

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V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

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

- b. Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - c. Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - d. Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -
To determine the actual worst case emissions rate for particulates, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = particulates emission rate (lbs/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment
 - e. Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -
If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
2. USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: P525 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. Additional Terms and Conditions		

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857040931 Emissions Unit ID: P526 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
RS left hand mount cell, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC
		2.5 lbs VOC/gallon of coating, excluding water and exempt solvents
		See A.I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation

OAC rule 3745-17-11(B)(1)
OAC rule 3745-17-07(A)

established pursuant to OAC rule 3745-31-05(A)(3).
0.551 lb/hour particulates
20% opacity, as a six-minute average, except as
provided by rule

2. **Additional Terms and Conditions**

- a. The permittee only employs water as cleanup material in this emissions unit.

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II. **Operational Restrictions**

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for the line:
- the name and identification number of each coating, employed;
 - the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - the VOC content of each coating employed, in pounds per gallon;
 - the number of gallons of each coating employed; and
 - the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

- The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
- The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (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 45 days after the exceedance occurs.
- 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 filter system was not in service when the 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 30 days after the event occurs.

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V. **Testing Requirements**

- Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following methods:
 - Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

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

- d. Emission Limitation -
 0.551 lb/hour particulates

Applicable Compliance Method -
 To determine the actual worst case emissions rate for particulates, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$

E = particulates emission rate (lbs/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

- e. Emission Limitation -
 20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -
 If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- 2. USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857040931 Emissions Unit ID: P526 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None