

Facility ID: 0857043048 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0857043048 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
enclosed spray paint booth, miscellaneous metal parts	OAC rule 3745-31-05 PTI 08-3716	286.4 pounds VOC/day, including cleanup; 1.86 tons VOC/month, including cleanup; 22.34 TPY VOC, including cleanup.
	OAC rule 3745-21-09(U)(1)(c)	Less than or equal to 3.5 pounds VOC/gallon coating, excluding water and exempt solvents.
	OAC rule 3745-17-11	0.551 pound particulates/hour
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. **Additional Terms and Conditions**
  - (a) None

**B. Operational Restrictions**

1. The maximum volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents.
2. The maximum monthly coating usage shall not exceed 1,040 gallons, excluding water and exempt solvents, and the maximum annual coating usage shall not exceed 12,480 gallons, excluding water and exempt solvents.
3. The maximum monthly cleanup usage shall not exceed 15 gallons.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, excluding water and exempt solvents, in pounds per gallon, as applied.
  - c. The number of gallons, excluding water and exempt solvents, of each coating employed.
  - d. The total number of gallons, excluding water and exempt solvents, of all coatings employed.
  - e. The name and identification of each cleanup material employed.
  - f. The VOC content of each cleanup material, in pounds per gallon.
  - g. The number of gallons of each cleanup material employed.
  - h. The total number of gallons of all cleanup materials employed.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons.
  - j. The total number of days the emissions unit was in operation.

- k. The average daily VOC emission rate for all coatings and cleanup materials, i.e., (g. X 2000/h.), in pounds per day (average).

**D. Reporting Requirements**

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information for this emissions unit :
  - a. An identification of each month during which the average daily organic compound emission rate exceeded the allowable emission limit stated above, and the actual average daily organic compound emission rate for each such month.
  - b. An identification of any month during which the monthly total VOC emission rate exceeded the allowable emission limits stated above, and the actual VOC emission rate for each such month.
  - c. An identification of each month during which the monthly coating usage rate and/or the cleanup usage rate exceeded the allowable usage limits stated above and the actual usage(s) for each such month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the total VOC emissions in tons, and the coating and cleanup usage rates in gallons. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 

Emission Limitation-  
286.4 lbs VOC/day, including cleanup

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

Emission Limitation-  
1.86 tons/month VOC, including cleanup

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

Emission Limitation-  
22.34 TPY VOC, including cleanup

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1., and shall be the sum of the monthly VOC emission rates for the calendar year.

Emission Limitation-  
0.551 lbs particulate matter/hr

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

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

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

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

Organic content limitation-  
3.5 lbs VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method-  
USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

1. Air Toxics Policy:
 

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 08-3716. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene, methyl n-propyl ketone, MIK, MEK, and n-butyl acetate emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: toluene

TLV (ug/m3):188,000  
Maximum Hourly Emission Rate (lbs/hr): 34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1219  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4476

Pollutant: xylene

TLV (ug/m3):434,000  
Maximum Hourly Emission Rate (lbs/hr):34.7  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):10333

Pollutant:methyl n-propyl ketone

TLV (ug/m3):705,000  
Maximum Hourly Emission Rate (lbs/hr):34.7  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):16786  
Pollutant: MIK

TLV (ug/m3):205,000  
Maximum Hourly Emission Rate (lbs/hr):34.7  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4881

Pollutant:MEK

TLV (ug/m3):590,000  
Maximum Hourly Emission Rate (lbs/hr):34.7  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):14048

Pollutant:n-butyl acetate

TLV (ug/m3):713,000  
Maximum Hourly Emission Rate (lbs/hr):34.7  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):16976

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 08-3716 and the operating permit:
  - a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.
  - b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
  - c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
  - d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
3. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 0857043048 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate**

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  - (a) None.
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  - (a) None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
prep area, etching	OAC rule 3745-31-05 PTI 08-3716	169.8 pounds OC/day; 1.11 tons OC/month; 13.24 TPY OC
	OAC rule 3745-21-07(G)	See A.II.1. below
	OAC rule 3745-17-11	0.551 pound particulates/hour
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. **Additional Terms and Conditions**

- (a) None

**B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited in this emissions unit.  
  
Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The maximum monthly coating usage shall not exceed 390 gallons and the maximum annual coating usage shall not exceed 4,680 gallons.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons of coating employed.
  - d. The organic compound content of each coating, in pounds per gallon as applied.
  - e. The total organic compound emission rate for all coatings, in tons per month.
  - f. The total number of days the emissions unit was in operation.
  - g. The average daily organic compound emission rate for the coatings, i.e., (d. X 2000/e.), in pounds per day (average).

**D. Reporting Requirements**

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information for this emissions unit:
  - a. An identification of each month during which the average daily organic compound emission rate exceeded the allowable emission limit stated above, and the actual average daily organic compound emission rate for each such month.
  - b. An identification of any month during which the monthly organic compound emission rate exceeded the allowable emission limit stated above, and the actual organic compound emission rate for each such month.
  - c. An identification of each month during which the monthly coating usage rate exceeded the allowable usage limits stated above and the actual usage for each such month.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the total organic compound emissions in tons from this emissions unit and the total number of gallons of coatings. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation-  
169.8 lbs/day organic compounds  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements specified in Section C.1.  
Emission Limitation-  
1.11 tons/month organic compounds

## Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.1.

## Emission Limitation-

13.24 TPY organic compounds

## Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.1., and shall be the sum of the monthly organic compound emission rates for the calendar year.

## Emission Limitation-

0.551 lbs particulate matter/hr

## Applicable Compliance Method-

To determine the actual worst case emissions rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

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

F. **Miscellaneous Requirements**

## 1. Air Toxics Policy:

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 08-3716. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene, methyl n-propyl ketone, MIK, MEK, and n-butyl acetate emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: toluene

TLV (ug/m3):188,000

Maximum Hourly Emission Rate (lbs/hr): 34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1219

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4476

Pollutant: xylene

TLV (ug/m3):434,000

Maximum Hourly Emission Rate (lbs/hr):34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):10333

Pollutant:methyl n-propyl ketone

TLV (ug/m3):705,000

Maximum Hourly Emission Rate (lbs/hr):34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):16786

Pollutant: MIK

TLV (ug/m3):205,000

Maximum Hourly Emission Rate (lbs/hr):34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):4881

Pollutant:MEK

TLV (ug/m3):590,000

Maximum Hourly Emission Rate (lbs/hr):34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):14048

Pollutant:n-butyl acetate

TLV (ug/m3):713,000

Maximum Hourly Emission Rate (lbs/hr):34.7

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):1219

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):16976

## 2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 08-3716 and the operating permit:

a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as

indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.

b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

3. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.