Facility ID: 0857043191 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.

Go to Part II for Emissions Unit P001
Go to Part II for Emissions Unit P002

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

Facility ID: 0857043191 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Four (4) solvent soak tanks	OAC rule 3745-35-07(B)	See A.2.a. and B.1.
	OAC rule 3745-31-05(A)(3) PTI # 08-4081	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). 7.3 TPY organic compounds Compliance with the air toxic policy.
	OAC rule 3745-21-07 (G)(2)	8.0 lbs/hr and 40 lbs/day organic compounds

2. **Additional Terms and Conditions**

   (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. **Operational Restrictions**

1. The maximum xylene solvent usage for P001 and P002 shall not exceed 3235 gallons based on a rolling, 12-month summation.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI # 08-4081 (issued February 24, 2000), the permittee shall not exceed the following xylene solvent gallon usage for P001 and P002 combined:

   Months Maximum, Cumulative Total Gallon Usage
   1 270
   1-2 540
   1-3 810
   1-4 1080
   1-5 1350
   1-6 1620
   1-7 1890
   1-8 2160
   1-9 2430
   1-10 2700
   1-11 2970
   1-12 3235

   After the first 12 calendar months of operation following the issuance of PTI # 08-4081 (issued February 24, 2000), the permittee shall comply with the annual gallon limitation based upon rolling 12-month summations.

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

1. The permittee shall collect and record the following information daily for the soak tank operation:

   a. the company identification for each solvent material employed;

   b. the number of gallons of each solvent material employed;

c. the organic compound content of each solvent material, in pounds per gallon;

d. the total organic compound emission rate for all solvent materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and,

f. the average hourly organic compound emission rate for all solvent materials, i.e., (d)/(e), in pounds per hour (average).

2. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each solvent material employed;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each solvent material, in pounds per gallon, as employed;

c. the total combined HAP content of each solvent material, in pounds per combined HAPs per gallon, as employed;

d. the number of gallons of each solvent material employed;

e. the total individual HAP emissions for each HAP from all solvent materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each solvent material);

f. the total combined HAP emissions from all solvent materials, in pounds or tons per month (the sum of (c) times (d) for each solvent material);

g. the rolling, 12-month summation of the total individual HAP emissions for each HAP from all solvent materials employed, in tons per year; and,

h. the rolling, 12-month summation for the total combined HAP emissions from all solvent materials employed, in tons per year.

3. The permit to install for this emissions unit P001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 12.04

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1214

MAGLC (ug/m3): 10,333.33
Pollutant: ethylbenzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 2.12

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 183.8

MAGLC (ug/m3): 10,333.33

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 1.84

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 215.7

MAGLC (ug/m3): 23,404.76

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with the general terms and conditions Section A.2. which identify all exceedances of:

a. each day during which the average hourly organic compound emissions from the solvent materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

b. each day during which the organic compound emissions from the solvent materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

c. the rolling, 12-month, usage limitation;

d. the rolling, 12-month, individual HAP limitation;

e. the rolling, 12-month, combined HAP limitation; and,

f. for the first 12 calendar months of operation following the issuance of PTI # 08-4081 (issued February 24, 2000), the maximum allowable cumulative xylene solvent material usage levels.

2. The permittee shall also submit annual reports which specify the individual HAP emission from the facility, the combined HAPs emissions from the facility, the total OC emissions from this emissions unit, and the total gallons of solvent materials employed in this emissions unit. 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 -
8.0 lbs OC/hr

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1.
Emission Limitation -
40.0 lbs OC/day

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1.
Emission Limitation -
7.3 TPY organic compounds

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year.
Emission Limitation -
Less than 10 TPY for any individual HAP and 25 TPY for any combination of HAPs, as a rolling 12-month summation

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.2.

F. **Miscellaneous Requirements**

1. None

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Go to the top of this document

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Twelve (12) groups of individual solvent stations	OAC rule 3745-35-07(D)	See A.2.a. and B.1.
	OAC rule 3745-31-05 (A)(3) PTI # 08-4081	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). 7.3 TPY organic compounds Compliance with the air toxic policy.
	OAC rule 3745-21-07 (G)(2)	8.0 lbs/hr and 40 lbs/day organic compounds

2. **Additional Terms and Conditions**

(a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. **Operational Restrictions**

1. The maximum xylene solvent usage for P001 and P002 shall not exceed 3235 gallons based on a rolling, 12-month summation.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI # 08-4081 (issued February 24, 2000), the permittee shall not exceed the following xylene solvent gallon usage for P001 and P002 combined:

Months Maximum, Cumulative Total Gallon Usage
1 270
1-2 540
1-3 810
1-4 1080
1-5 1350
1-6 1620
1-7 1890
1-8 2160
1-9 2430
1-10 2700
1-11 2970
1-12 3235

After the first 12 calendar months of operation following the issuance of PTI # 08-4081(issued February 24, 2000), the permittee shall comply with the annual gallon limitation based upon rolling 12-month summations.

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

1. The permittee shall collect and record the following information daily for the 12 groups of individual solvent stations:

a. the company identification for each solvent material employed;

b. the number of gallons of each solvent material employed;

c. the organic compound content of each solvent material, in pounds per gallon;

d. the total organic compound emission rate for all solvent materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and,

f. the average hourly organic compound emission rate for all solvent materials, i.e., (d)/(e), in pounds per hour

(average).

2. The permittee shall collect and record the following information each month for the entire facility:

   a. the name and identification of each solvent material employed;

   b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each solvent material, in pounds per gallon, as employed;

   c. the total combined HAP content of each solvent material, in pounds per combined HAPs per gallon, as employed;

   d. the number of gallons of each solvent material employed;

   e. the total individual HAP emissions for each HAP from all solvent materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each solvent material);

   f. the total combined HAP emissions from all solvent materials, in pounds or tons per month (the sum of (c) times (d) for each solvent material);

   g. the rolling, 12-month summation of the total individual HAP emissions for each HAP from all solvent materials employed, in tons per year; and,

   h. the rolling, 12-month summation for the total combined HAP emissions from all solvent materials employed, in tons per year.

3. The permit to install for this emissions unit P002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: xylene

   TLV (ug/m3): 434,000

   Maximum Hourly Emission Rate (lbs/hr): 12.04

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 1214

   MAGLC (ug/m3): 10,333.33
   Pollutant: ethylbenzene

   TLV (ug/m3): 434,000

   Maximum Hourly Emission Rate (lbs/hr): 2.12

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 183.8

   MAGLC (ug/m3): 10,333.33

   Pollutant: isopropyl alcohol

   TLV (ug/m3): 983,000

   Maximum Hourly Emission Rate (lbs/hr): 1.84

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 215.7

   MAGLC (ug/m3): 23,404.76

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with the general terms and conditions Section A.2. which identify all exceedances of:

a. each day during which the average hourly organic compound emissions from the solvent materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

b. each day during which the organic compound emissions from the solvent materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

c. the rolling, 12-month, usage limitation;

d. the rolling, 12-month, individual HAP limitation;

e. the rolling, 12-month, combined HAP limitation; and,

f. for the first 12 calendar months of operation following the issuance of PTI # 08-4081 (issued Febraury 24, 2000), the maximum allowable cumulative solvent material usage levels.

2. The permittee shall also submit annual reports which specify the individual HAP emission from the facility, the combined HAPs emissions from the facility, the total OC emissions from this emissions unit, and the total gallons of solvent materials employed in this emissions unit. 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 -
8.0 lbs OC/hr

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1.
Emission Limitation -
40.0 lbs OC/day

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1.
Emission Limitation -
7.3 TPY organic compounds

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year.
Emission Limitation -
Less than 10 TPY for any individual HAP and 25 TPY for any combination of HAPs, as a rolling 12-month summation

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.2.

F. **Miscellaneous Requirements**

1. None