

Facility ID: 0857093261 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 0857093261 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>
K001 - spray paint booth with dry filtration system and electric drying oven	OAC rule 3745-31-05(A)(3) PTI 08-04684	The volatile organic compounds (VOC) emissions shall not exceed 7.3 tons per year (TPY), including cleanup materials.  See Section A.2 below.  The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e), and OAC rule 3745-21-07(G)(2).  The coating usage shall be less than or equal to 8 gallons per day.  See A.2.a below.  The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials.
	OAC rule 3745-21-09(U)(2)(e)	
	OAC rule 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- (a) The source is subject OAC rule 3745-21-09(U)(2)(e) when coating metal parts, and OAC rule 3745-21-07(G)(2) applies when coating non-metal parts. VOC emissions limitations for OAC rule 3745-21-07(G)(2) are more restrictive compared to emissions that would be generated using the 8 gallon/day coating usage limitation from OAC rule 3745-21-09(U)(2)(e). Therefore, emissions unit will comply with the allowable emissions limitations in OAC rule 3745-21-07(G)(2) while coating metal parts, also. The 8 lb/hr emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

**B. Operational Restrictions**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.
2. The permittee shall operate the dry filter system for control of particulate emissions whenever this emission unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.
2. The permittee shall collect and record the following information each day for the coating line:
  - a. The company name and identification of each coating and cleanup material employed.
  - b. The number of gallons of each coating material employed.

- c. The number of gallons of cleanup material employed.
  - d. The organic compound content of each coating and cleanup material employed, in pounds per gallon.
  - e. The number of gallons of cleanup materials recovered for recycling or treatment.
  - f. The organic compound emission rate from cleanup materials, in pounds, i.e., (c - e) x (d) for cleanup materials employed.
  - g. The organic compound emission rate from all coatings and cleanup materials, in pounds, i.e., (b x d) for coatings employed.
  - h. The total organic compounds emissions rate from all coatings and cleanup materials, in pounds, i.e., (f + g).
3. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating and cleanup materials for the calendar year in Section C.2]
4. The permit to install for this emissions unit K001 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 (mg/m3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.71

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 114.33

MAGLC (ug/m3): 10,338

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.
- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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".
    - 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.
  - 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions from the coatings and cleanup materials used exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

4. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total VOC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -  
less than or equal to 8 gallons/day coating usage for the coatings use

Applicable Compliance Method -

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

- b. Emission Limitation -  
8 lb/hour and 40 lb/day OC for the coatings and cleanup materials

Applicable Compliance Method -

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

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation -  
6.19 TPY VOC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the daily VOC emission rates.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If 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 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.

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

**F. Miscellaneous Requirements**

1. None