Facility ID: 0857093330 Issuance type: Final State Permit To Operate

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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: 0857093330 Emissions Unit ID: R008 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R008 - Cameo Saturn silk screen printing press and oven (metal and plastic parts)	OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V) PTI 08-04867	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.
		The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
	OAC rule 3745-21-07(M)(4)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
	OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
	OAC rule 3745-31-05(A)(3)(b)	See A.2.c.

2. **Additional Terms and Conditions**

   (a) The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to OAC rule 3745-21-07(M(4) and more stringent than the emission limitations established pursuant to OAC rule 3745-21-09(U)(2)(e)(i).
   By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(M)(4) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
   The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. **Operational Restrictions**

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

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

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

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

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

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

d. the total organic compound emission rate for all coatings and cleanup 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 coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP* emissions:

a. The name and company identification of each coating material employed.

b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.

c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.

d. The number of gallons of each coating material employed.

e. The name and company identification of each cleanup material employed.

f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.

g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.

h. The number of gallons of each cleanup material employed.

i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.

j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h), in tons.

k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (I)], in tons per year.

l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.
*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

D. **Reporting Requirements**

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:

a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;

b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and

c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate 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.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

4. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. **Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.
Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 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.
The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.
The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. **Miscellaneous Requirements**

1. None