

Facility ID: 0857173091 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: 0857173091 Emissions Unit ID: P003 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> |
|---|--------------------------------------|---|
| P003 - 600 gallon process mix tank/holding tank with an in-line condenser and dryer | OAC rule 3745-31-05(A)(3) | The organic compound emissions from this emissions unit shall not exceed 0.30, lb/hr, excluding cleanup, 11.14 lbs/day, and 2.04 TPY, including cleanup |
| | OAC rule 3745-21-07(G)(2) | The emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) |

2. Additional Terms and Conditions

- (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. The average temperature of the inline condenser, for any 3-hour block of operating time, shall not be more than 35 degrees Celsius (95 degrees Fahrenheit).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information, each month, for emissions unit P003:
 - a. the company identification for each solvent and cleanup material employed;
 - b. the number of pounds of each solvent and cleanup material employed for each batch;
 - c. the total number of batches for each month;
 - d. the organic compound emission rate for each solvent and cleanup material employed, in pounds per month, i.e. (b)*(c)*(0.012), including the 1.2% loss;
 - e total number of days that a batch was run per month; and
 - f. the average daily organic compound emission rate for each solvent and cleanup material, in pounds per number of days a batch was run, i.e. (d)*(e); and
 - g. the annual organic compound emission rate, in tons per year, for each solvent and cleanup material employed, will be calculated by summing all the average daily organic compound emission rates, in pounds per day, for each day that a batch was run and divide by 2000 lbs.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the inline condenser temperature, in degrees Fahrenheit, during each 3-hour block. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The monitoring devices shall be capable of accurately measuring the desired parameter.
3. The permittee shall collect and record the following information:
 - a. The permittee shall record the average temperature of the inline condenser during each of the three-hour blocks of operating time each day.

- b. A log or record of operating time for the inline condenser and the associated emissions unit each day.
4. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):
- Pollutant: Methanol
- TLV (mg/m3): 262.08
- Maximum Hourly Emission Rate (g/s): 0.0585
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 59.13
- MAGLC (ug/m3): 6,240
- Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:
- 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;
 - 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,
 - 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.)
5. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
- For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

D. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - An identification of each month during which the organic compound emissions from the coatings exceeded an average of 11.14, pounds per day, including cleanup.
 - Any temperature deviation reports that identify any 3-hour blocks of operating time during which the average temperature of the inline condenser exceeded the temperature limitation specified above.

E. Testing Requirements

- Compliance with the emission limitation(s) in Section A.I. of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation -

0.30 lb OC/hour, excluding clean-up

Compliance with the hourly allowable OC emission limitation shall be determined by multiplying the maximum amount of organic compound material employed during a 24 hour reaction time of 600 lbs by the % loss factor (0.012) and dividing by 24 hr/day.

Emission Limitation -

11.14 lbs OC/day, including clean-up

The 11.14 lbs/day limitation was developed by multiplying 0.464 lb/hr (0.30lb/hr excluding cleanup plus 0.164lb/hr, including cleanup) by 24 hrs/day. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the daily limitation.

Compliance shall be based upon the record keeping specified in section C.1. recordkeeping and daily averages.

Emission Limitation -

2.04 TPY OC, including clean-up

The 2.04 TPY limitation was developed by multiplying 0.464 lb/hr by the maximum annual operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. **Miscellaneous Requirements**

1. None