Facility ID: 0857731991 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: 0857731991 Emissions Unit ID: K011 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
K011 - Paint spray booth No. 12	OAC rule 3745-31-05(A)(3)(b) PTI 08-04879	The uncontrolled potential to emit for the VOC emissions for this emissions unit is less than 10 tons per year.
	OAC rule 3745-21-09(U)(2)(e)(i)	VOC emission exemption, based on maximum daily coating usage not exceeding 8 gallons of coating in any one day.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and 40 CFR Part 63, subpart MMMM)	The volatile organic compound emissions rates from K001,K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 combined shall not exceed 32.83 tons per rolling 12-month summation, including cleanup. 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, K003, K004, K005, K006, K007, K008, K009, K010, K011 and de minimis and permit exempt combined air contaminant sources 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.

2. **Additional Terms and Conditions**

   (a) The Potential to Emit (PTE) of VOC from this emissions unit is 9.49 TPY.

B. **Operational Restrictions**

1. The maximum annual combined volatile organic material usage for emission units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 shall not exceed 32.83 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of coatings and cleanup. The annual volatile organic material usage in this term equates to the annual VOC emission rate in term A.1 based upon the premise that 100% of all the solvents contained within the material usage is emitted and therefore all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

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

1. The permittee shall collect and record the following information each day for this emissions unit:

   a. The name and identification number of each coating employed.

   b. The number of gallons of each coating employed.

   c. The total number of gallons of all the coatings employed.

2. The permittee shall collect and record the following information for each month for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011:

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

b. The number of gallons of each coating and cleanup material employed.

c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all coating and cleanup materials employed [i.e., summation of (b) x (c) for all coating and cleanup materials employed divided by 2,000 lbs/ton], in tons per month.

e. The rolling, 12-month summation of VOC emissions from all coating and cleanup materials, in tons.

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, and de minimis and permit exempt combined air contaminant sources :

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

b. The amount of each coating and cleanup material employed, in gallons.

c. The individual Hazardous Air Pollutant (HAP) content for each coating and cleanup material employed, in pounds of individual HAP per gallon.

d. The total combined HAP content of each coating and cleanup material employed, in pounds of combined HAPs per gallon (the sum of all the individual HAP contents from section A.3.c. above).

e. The total individual HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (c) for each individual HAP divided by 2,000 lbs/ton].

f. The total combined HAP emission rate for all coating and cleanup materials employed, in tons [i.e., the sum of (b) x (d) divided by 2,000 lbs/ton].

g. The total individual HAP emission rate from all de minimis and/or exempt emission units, in tons.

h. The total combined HAP emission rate from all de minimis and/or exempt emission units, in tons.

i. The rolling, 12-month total individual HAP emission rate for each HAP, in tons.

j. The rolling, 12-month total combined HAPs emission rate for all the HAPs, in tons.

* A listing of the HAPs 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 agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit K011 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 10.08
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 432
MAGLC (ug/m3): 4,486

5. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

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:

a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 32.83 tons per year rolling, 12-month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month (for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011

combined).

b. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources).

c. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, de minimis, and permit exempt combined air contaminant sources).

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 which specify the VOC emissions, in tons, from all emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
8 gallons per day total coating usage

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.1.
Emissions Limitation:
The volatile organic compound emissions rates from K001,K002, K003, K004, K005, K006, K007, K008, K009, K010, and K011 combined shall not exceed 32.83 tons per rolling 12-month summation, including cleanup.

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.2.
Emissions Limitation:
9.9 tons for each individual HAP per rolling, 12-month period for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, and de minimis and permit exempt combined air contaminant sources .

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.3.
Emissions Limitation:
24.9 tons for all HAPs combined per rolling, 12-month period for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, and de minimis and permit exempt combined air contaminant sources .

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.3.

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, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA 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 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.

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

F. **Miscellaneous Requirements**

1. All of the terms and conditions in this permit are federally enforceable, excluding C.4.