

Facility ID: 0857733184 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: 0857733184 Emissions Unit ID: P012 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>
600 gallon mixer with 60 horse power disperser	OAC rule 3745-31-05(A)(3) PTI 08-04619	The organic compound (OC) emissions from this emissions unit shall not exceed 2.45 pounds per hour (lbs/hr) and 40 pounds per day (lbs/day). The OC emissions from this emissions unit shall not exceed 7.3 tons per year (TPY).
	OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V and 40 CFR Part 63, Subpart HHHHH.	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07. Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
 - (a) The 2.45 lbs OC/hour emission limitation is being developed for PTI purposes 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 this limit.

B. Operational Restrictions

1. The maximum daily primer production rate for this emissions unit shall not exceed 816 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this primer mixer:
 - a. The company identification for each primer produced.
 - b. The number of gallons of each primer produced.
 - c. The total number of gallons of primer produced.
 - d. The organic compound content of each primer produced, in pounds per gallon.
 - e. The total organic compound (OC) emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
 - f. The sum of the total OC emissions from each primer produced (i.e., the sum of (e) above).

2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011 and P012):
- The name and identification number of each coating, primer, undercoat, and intermediate produced.
 - The individual HAP* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
 - The number of gallons of each coating, primer, undercoat, and intermediate produced.
 - The name and identification of each cleanup material employed.
 - The individual HAP* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
 - The number of gallons of each cleanup material employed.
 - The number of gallons of cleanup material recovered for disposal.
 - The total individual HAP emissions from each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
 - The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
 - The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
 - The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, 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 district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P012) 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: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 20.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 846

MAGLC (ug/m3): 2029

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 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:

- 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.).

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.

4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - 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 which include the following information:
 - a. An identification of each day during which the organic compound emissions from the primers exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the daily primer production for this emissions unit exceeded 816 gallons per day, and the actual primer production for each such day.
 - c. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation specified in Section A.1 of these terms and conditions.
 - d. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation specified in Section A.1 of these terms and conditions.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this 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. 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 emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation -

The OC emissions from this emissions unit shall not exceed 2.45 lbs/hr.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all primers mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.

Emission Limitation -

The OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1.

Emission Limitation -

The OC emissions from this emissions unit shall not exceed 7.3 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

Emission Limitation -

The individual HAP emissions from this emissions unit shall not exceed 9.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

Emission Limitation -

The total combined HAP emissions from this emissions unit shall not exceed 24.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

Operational Limitation -

The primer production from this emissions unit shall not exceed 816 gallons/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1.

F. Miscellaneous Requirements

1. None