

Facility ID: 1318002288 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: 1318002288 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 - Devilbiss Paint Spray Booth	OAC rule 3745-31-05(A)(3) PTI 13-04637	VOC emissions shall not exceed 2.74 TPY, excluding emissions from cleanup materials
Emission unit was installed in 1986.	Issued 11/21/06	VOC emissions from cleanup material shall not exceed 0.60 TPY
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(h)
	OAC rule 3745-21-09(U)(2)(h)	See A.2.a below.

2. **Additional Terms and Conditions**
 - (a) The permittee shall not cause to emit more than 15 pounds of VOC per day (before add-on controls) from all miscellaneous metal parts or products coating lines within the facility, excluding emissions from cleanup material.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all miscellaneous metal parts coating lines at the facility:
 - a. the name and identification number of each coating, as applied;
 - b. the volume, in gallons, of each coating including thinner, as applied;
 - c. the VOC content, in lbs VOC/gallon, of each coating including thinner, as applied calculated using the following equation:

 VOC content, as applied =

$$\frac{[(\text{lbs VOC/gallon of coating}) \times (\% \text{ of coating in mixture as applied})] + [(\text{lbs VOC/gallon of thinner}) \times (\% \text{ of thinner in mixture as applied})]}{\text{where: mixture} = \text{coating} + \text{thinner}}$$
 - d. the total VOC emissions from the coatings employed, as calculated using the following equation:

$$E = (\text{VOC content, as applied}) \times (\text{gallons coating including thinner/day})$$
 where
 VOC content = lbs VOC/gallon of coating as applied (as determined in c above);
 E = lbs VOC/day of each coating used

If more than one coating is used in the same day, perform the above calculation for each coating and sum the

emissions from all of the coatings together.

2. The permittee shall collect and record the following information for each month:
 - a. the company identification for each cleanup material employed;
 - b. the amount, in gallons, of each cleanup material employed;
 - c. the organic compound content of each cleanup material, in pounds per gallon;
 - d. the amount, in gallons, of clean-up material that is contained for disposal; and
 - e. the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of c x (b - d)].

3. The permit to install for this emissions unit K001 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: Xylene
 TLV (mg/m3): 434.2
 Maximum Hourly Emission Rate (lbs/hr): 1.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114.5
 MAGLC (ug/m3): 10,338

4. 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:
 - 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.).

5. 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) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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 the 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 notify the Cleveland Division of Air Quality (CDAQ) in writing of any daily record showing that the combined VOC emissions (excluding emissions from cleanup materials) from all of the miscellaneous metal parts coating lines at the facility are equal to or greater than 15 pounds of VOC per day (before add-on controls). The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
2. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing of any yearly record showing that the cleanup material emissions at the facility are greater than 0.60 tons of VOC. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
15 lbs VOC/day, for coatings

Applicable Compliance Method:
Compliance shall be based upon the record keeping and reporting requirements as specified in C.1 and D.1.

 - b. Emissions Limitation:

2.74 TPY for coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in C.1 by summing the actual daily emissions for each calendar year.

c. Emission Limitation

0.60 TPY VOC from cleanup material

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively by summing actual monthly emissions for each calendar year.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. **Miscellaneous Requirements**

1. None