

Facility ID: 1318006616 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.

[Go to Part II for Emissions Unit K004](#)
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Facility ID: 1318006616 Emissions Unit ID: K004 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>
exterior drum coating line with dry filter	OAC rule 3745-31-05(A)(3) (PTI # 13-03573)	Volatile organic compound (VOC) emissions shall not exceed 6.69 lbs/hr and 29.34 tons per year (tpy) with 29.30 tpy from the coating and 0.04 tpy from cleanup materials.
	OAC rule 3745-21-09(U)(1)(f)	See section B.1. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The permittee shall operate the dry filter whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - the name and identification number for each coating employed;
 - the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents, as applied;
 - the VOC content of each coating employed, in pounds per gallon, as applied;
 - the name and identification of each cleanup material employed;
 - the VOC content of each cleanup material employed, in pounds per gallon, as applied;
 - the amount, in gallons, of each cleanup material dispensed;
 - the amount, in gallons, of cleanup material that is contained for disposal;
 - the amount, in gallons, of evaporated cleanup material, which is estimated by subtracting the volume of cleanup material contained for disposal from the volume of dispensed cleanup material, in gallons;
 - the amount, in gallons, of each coating employed;
 - the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (c*i) for all coatings + summation of (e*h) for each cleanup material];
 - the number of hours of operation; and
 - the average hourly VOC emission rate (j / k).
2. The permittee shall maintain daily records that document any time periods when the dry filter was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the total VOC emissions from all coatings employed, sum of monthly emissions (section C.1.j), for this emissions unit for the purpose of determining annual VOC emissions.
4. The permittee shall collect and record the total VOC emissions from evaporated cleanup material, sum of monthly emissions, for this emissions unit for the purpose of determining annual VOC emissions.
5. The permit to install for this emissions unit (K004) was evaluated based on the actual materials (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. 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. 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 0.38
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34.95
 MAGLC (ug/m3): 4485.83

Pollutant: VM&P Naptha
 TLV (ug/m3): 1,398,773
 Maximum Hourly Emission Rate (lbs/hr): 0.25
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22.99
 MAGLC (ug/m3): 33304.12

Pollutant: Xylenes
 TLV (ug/m3): 434,192
 Maximum Hourly Emission Rate (lbs/hr): 0.02
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.824
 MAGLC (ug/m3): 10337.90

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 (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 emission unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 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

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 Local Air Agency (CLAA) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the CLAA within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which the average hourly emission rate was exceeded, and (b) describe any corrective actions taken to prevent the reoccurrence. These reports shall be submitted to the CLAA no later than January 31, April 30, July 31, and October 31 of each year and shall cover the previous quarter (3-month calendar) period.
3. The permittee shall submit an annual emission report including the VOC emissions for both the coating line and clean-up material. This report shall be submitted no later than January 31 following 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:
 3.5 lbs of VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with this emission limitation shall be based on the record keeping in section C.1.b. The VOC content of the coatings shall be determined using USEPA Method 24 of 40 CFR, Part 60, Appendix A.

Emission Limitation:
 6.69 lbs/hr of VOC

Applicable Compliance Method:

Compliance with this emission limitation shall be based on the record keeping in section C.1.i.

Emission Limitation:
 29.34 tpy of VOC

Applicable Compliance Method:

Compliance with this emission limitation shall be based on the record keeping in section C.3.

F. Miscellaneous Requirements

1. None

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Facility ID: 1318006616 Emissions Unit ID: K005 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>
interior drum coating line with dry filter	OAC rule 3745-31-05(A)(3) (PTI # 13-03573)	Volatile organic compound (VOC) emissions shall not exceed 0.69 lb/hr and 3.03 tons per year (tpy) with 3.02 tpy from the coating and 0.01 tpy from cleanup materials.
	OAC rule 3745-21-09(U)(1)(e)	See section B.1 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**

- (a) None

B. Operational Restrictions

1. The permittee shall operate the dry filter whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - the name and identification number of each coating employed;
 - the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents, as applied;
 - the VOC content of each coating employed, in pounds per gallon, as applied;
 - the name and identification of each cleanup material employed;
 - the VOC content of each cleanup material employed, in pounds per gallon, as applied;
 - the amount, in gallons, of each cleanup material dispensed;
 - the amount, in gallons, of cleanup material that is contained for disposal;
 - the amount, in gallons, of evaporated cleanup material, which is estimated by subtracting the volume of cleanup material contained for disposal from the volume of dispensed cleanup material, in gallons;
 - the amount, in gallons, of each coating employed;
 - the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (c * i) for all coatings + summation of (e * h) for each cleanup material];
 - the number of hours of operation; and
 - the average hourly VOC emission rate (j / k).
2. The permittee shall maintain daily records that document any time periods when the dry filter was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the total VOC emissions from all coatings employed, sum of monthly emissions (section C.1.j), for this emissions unit for the purpose of determining annual VOC emissions.
4. The permittee shall collect and record the total VOC emissions from evaporated cleanup material, sum of monthly emissions, for this emissions unit for the purpose of determining annual VOC emissions.
5. The permit to install for this emissions unit (K005) was evaluated based on the actual materials (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. 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. 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 0.38
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34.95
 MAGLC (ug/m3): 4485.83

Pollutant: VM&P Naptha
 TLV (ug/m3):1,398,773
 Maximum Hourly Emission Rate (lbs/hr): 0.25
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22.99
 MAGLC (ug/m3): 33304.12

Pollutant: Xylenes
 TLV (ug/m3): 434,192
 Maximum Hourly Emission Rate (lbs/hr): 0.02
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.824
 MAGLC (ug/m3): 10337.90

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 (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 emission unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 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
 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

- The permittee shall notify the Cleveland Local Air Agency (CLAA) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the CLAA within 30 days following the end of the calendar month.
- The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which the average hourly emission rate was exceeded, and (b) describe any corrective actions taken to prevent the recurrence. These reports shall be submitted to the CLAA no later than January 31, April 30, July 31, and October 31 of each year and shall cover the previous quarter (3-month calendar) period.
- The permittee shall submit an annual emissions report including the VOC emissions for both the coating line and clean-up material. This report shall be submitted no later than January 31 following the previous calendar year.

E. Testing Requirements

- 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:
 4.30 lbs of VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with this emission limitation shall be based on the record keeping in section C.1.b. The VOC content of the coatings shall be determined using USEPA Method 24 of 40 CFR, Part 60, Appendix A.

Emission Limitation:
 0.69 lb/hr of VOC

Applicable Compliance Method:

Compliance with the above VOC limitation shall be determined by the record keeping in section C.1.1.
 Emission Limitation:

3.03 tpy of VOC

Applicable Compliance Method:

Compliance with the above VOC limitation shall be determined by the record keeping in section C.3.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1318006616 Emissions Unit ID: N001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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- 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>
drum reclamation incinerator with afterburner; 720 lbs/hr max.	OAC rule 3745-31-05(A)(3) (PTI # 13-01678)	No visible emissions in the exhaust gases at any time.
	OAC rule 3745-17-09(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(B) and 3745-17-09(C).
	OAC rule 3745-17-07(A)(1)	The reclamation incinerator shall be designed, operated, and maintained to prevent the emission of objectionable odors.
	OAC rule 3745-17-09(B)	Visible emission limitations specified in this rule are less stringent than the visible emission limitations established pursuant to OAC rule 3745-31-05(A)(3). Particulate emissions (PE) shall not exceed 0.10 lb per 100 lbs of liquid, semi-solid, solid refuse, and/or salvageable material charged.

- 2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

- 1. The average temperature of the exhaust gases from the thermal incinerator (afterburner), for any 3-hour block of time, shall be not less than 1400 degrees Fahrenheit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information each day:
 - The average temperature of the exhaust gases from the thermal incinerator during each 3-hour block of time during the day.
 - A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 3. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - the color of the emissions;

the total duration of any visible emission incident; and
any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit quarterly temperature deviation (excursion) reports that (a) identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerator (afterburner) does not comply with the temperature limitation specified in B.1, and (b) describe any corrective actions taken to prevent the reoccurrence. These reports shall be submitted to the Cleveland Local Air Agency (CLAA) no later than January 31, April 30, July 31, and October 31 of each year and shall cover the previous quarter (3-month calendar) period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emission unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the CLAA by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

0.1 lb PE/100 lbs of liquid, semi-solid, solid refuse, and/or salvageable material charged.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted approximately 6 months prior to permit expiration.

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60 Appendix A, Methods 1-5. Concurrent visible emission observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Local Air Agency (CLAA).

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the CLAA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the CLAA's refusal to accept the results of the emissions test.

Personnel from the CLAA shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the CLAA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CLAA.

Emission Limitation:

No visible emissions in the exhaust gases at any time.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using U.S. EPA Method 22 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

1. None