

Facility ID: 1318007870 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: 1318007870 Emissions Unit ID: K013 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>
K013 - Global Finishing Solutions - Model #FP676 paint spray booth with disposable filters and a Craftsman 2.5 gal. pressure tank with a Binks 2001 Spray Gun for coating miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 13-04378 issued 01/25/05)	Volatile organic compound (VOC) emissions shall not exceed 28.0 lbs/day and 5.11 tons/year (tpy), including both coatings and cleanup emissions.
		See Section B.4.
		The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-21-09(U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	VOC emissions from the facility* shall not exceed 99.0 tpy.
		See A.2.a, B.1, B.2, and B.3.

2. Additional Terms and Conditions

- (a) The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility (See Section A.2.b) shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions. The facility emission limits shall include emissions from the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K010, K011, K012, K013, K109 and L002.

B. Operational Restrictions

1. The maximum annual volatile organic material usage for the facility (emissions units K001, K002, K003, K004, K005, K006, K007, K008, K010, K011, K012, K013, K109 and L002) shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months shall be used to determine the rolling, 12-month volatile organic material usage for the facility.
2. The maximum annual individual HAP material usage for the facility (emissions units K001, K002, K003, K004, K005, K006, K007, K008, K010, K011, K012, K013, K109 and L002) shall not exceed 9.9 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the actual individual HAP material usage records over the previous 12 calendar months shall be used to determine the rolling, 12-month individual HAP material usage for the facility.
3. The maximum annual combined HAP material usage for the facility (emissions units K001, K002, K003, K004, K005, K006, K007, K008, K010, K011, K012, K013, K109 and L002) shall not exceed 24.9 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.
4. The permittee shall operate the dry filtration system for control of particulate emissions 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 day for this emissions unit:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon employed;
 - c. The individual single HAP content of each coating and cleanup material, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material, in pounds per gallon;
 - e. The number of gallons of each coating and cleanup material employed;
 - f. The daily VOC emissions from all coatings and cleanup materials employed, in pounds or tons (sum of 1.b x 1.e for each coating and cleanup material, and subtracting any recovered material**);

** If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emissions reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.3.

2. The permittee shall collect and record the following information each month for the facility (See Section A.2.b):
 - a. The name and ID number of each coating and cleanup material employed;
 - b. The weight (lbs/month) of each coating and cleanup material employed as applied;
 - c. The VOC content of each coating and cleanup material employed, as applied, in percent by weight;
 - d. The total volatile organic material usage from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each coating and cleanup material (lbs/month);
 - e. The total VOC emissions generated from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each coating and cleanup material, and subtracting any recovered material**, (lbs/month);
 - f. The rolling, 12-month summation of volatile organic material usage from all coating and cleanup materials employed, in tons;
 - g. The individual and combined HAP content for each coating and cleanup material employed, as applied, in percent by weight;
 - h. The total individual and combined HAP material usage from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.g)] for each coating and cleanup material (lbs/month);
 - i. The total individual and combined HAP emissions generated from all coating and cleanup materials employed calculated by summing the records of [(2.b) x (2.g)] for each coating and cleanup material (lbs/month); and
 - j. The rolling, 12-month summation of each individual and combined HAP material usage and emissions from all coating and cleanup materials employed, in tons.

** If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emissions reports; records of the total amount (gals or lbs) of the materials collected and added to the recovery tank/drum shall be maintained as required in Section C.3.

3. If a credit for recovered materials is used to demonstrate facility (See Section A.2.b) compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered materials and the recovery drum, or tank, serving this emissions unit:
 - a. The date the materials from the recovery drum or tank were shipped off site;
 - b. The amount of recovered material (gals or lbs) from the recovery drum or tank shipped off site;
 - c. The average density of the recovered material (lbs/gal) from the recovery drum or tank (if the amount is recorded in gallons);
 - d. The average VOC content for the recovered material, in percent by weight; and
 - e. The average VOC emissions from the recovered materials [(3.b) x (3.d)], in pounds. Note the average VOC emissions, in pounds, from the recovered material is calculated as [(3.b) x (3.c) x (3.d)] if the material amount is recorded in gallons.

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to a generic screening model for common pollutants emitted by this industry using the parameters outlined in the applicability criteria document for the Ohio Coatings General Permit 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: Xylene (36.82% by weight of coating VOC content, as applied)
TLV (ug/m3): 434360

Maximum Hourly Emission Rate (lbs/hr): 33.13 (total coating VOC content, as applied)
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2151.81
 MAGLC (ug/m3): 10341.9

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. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. 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. Volatile organic compounds (VOC) are defined as photochemically reactive materials (PRM's). Definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC Rule 3745-21-01(C)(5).

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the CDAQ within 30 days after the end of the calendar month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
2. The permittee shall notify the CDAQ of any monthly record showing the exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the CDAQ within 30 days after the end of the calendar month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
3. The permittee shall submit annual reports to the CDAQ which summarize the annual emissions of VOC from this emissions unit. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
4. The permittee shall submit deviation (excursion) reports which include the following information for the facility (See Section A.2.b):
 - a. An identification of each month during which the rolling, 12-month individual HAP material usage exceeded 9.9 tons/yr based on a rolling, 12-month summation;
 - b. An identification of each month during which the rolling, 12-month individual HAP emissions exceeded 9.9 tons/yr based on a rolling, 12-month summation;
 - c. An identification of each month during which the rolling, 12-month combined HAP material usage exceeded 24.9 tons/yr based on a rolling, 12-month summation;
 - d. An identification of each month during which the rolling, 12-month combined HAP emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
 - e. An identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons/yr based on a rolling, 12-month summation;
 - f. An identification of each month during which the rolling, 12-month VOC emissions exceeded 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the CDAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
5. The permittee shall notify the CDAQ in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDAQ within 30 days after the end of the calendar month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:
 VOC emissions shall not exceed 28.0 lbs/day

Applicable Compliance Method:
 Compliance shall based upon the record keeping specified in Section C.1.

Emissions Limitation:
 VOC emissions shall not exceed 5.11 tpy

Applicable Compliance Method:
 Compliance shall based upon the record keeping specified in Section C.1 and shall be the sum of the daily

emission rates for the calendar year.

Emission Limitation:

99.0 tons VOC per rolling, 12-month period for this facility (See Section A.2.b)

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Section C.

Emission Limitation:

9.9 tons individual HAP emissions per rolling, 12-month period for this facility (See Section A.2.b)

Applicable Compliance Method:

Compliance shall be determined based on the record keeping specified in Section C.

Emission Limitation:

24.9 tons combined HAP emissions per rolling, 12-month period for this facility (See Section A.2.b)

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Section C.

2. U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coating and cleanup material. The CDAQ may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. **Miscellaneous Requirements**

None