

Facility ID: 1318008400 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.

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Facility ID: 1318008400 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 - Coating booth (west) used to coat fabricated metal parts	OAC rule 3745-31-05(A)(3) (PTI 13-04315 issued 10/12/04)	20.5 TPY VOC 4.7 lbs VOC/hr
	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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

B. Operational Restrictions

1. The permittee shall operate the filtration system 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 employed;
 - b. the amount, in gallons, of each coating employed;
 - c. the VOC content of each coating, in pounds per gallon, as applied;
 - d. the VOC content of coatings, in pounds per gallon less water and exempt solvents, as applied;
 - e. the total VOC emission rate for all coatings, in pounds [summation of (b x c) for all coatings];
 - f. hours of operation; and
 - g. average hourly emissions rate, in lbs/hr (e/f).
2. The permittee shall collect and record the total VOC emissions from all coatings for this emissions unit for the purpose of determining annual VOC emissions (summation of daily emissions from C.1.e above divided by 2000 lbs/ton).
3. The permittee shall maintain daily records and document any time periods when the dry exhaust filtration system was not in service when this emissions unit was in operation.
4. 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: 2 - Butoxyethanol
 TLV (mg/m3): 96.663
 Maximum Hourly Emission Rate (lbs/hr): 0.97
 Predicted 1-Hour Maximum Ground-Level Concentration(g/m3): 89.27
 MAGLC (g/m3): 2,301.5

Pollutant: sec - butanol
 TLV (mg/m3): 303.15
 Maximum Hourly Emission Rate (lbs/hr): 0.46
 Predicted 1-Hour Maximum Ground-Level Concentration(g/m3): 42.37
 MAGLC (g/m3): 7218

5. 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 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");
 - 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.).
6. 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

- The permittee shall notify the Cleveland Division of Air Quality (DAQ) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month.
- The permittee shall notify the Cleveland DAQ in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of the record and shall be sent within 30 days after the event occurs.
- The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify each day during which the average hourly VOC emissions from the coating operation exceeded 4.7 lbs VOC/hr. Each report shall be submitted in accordance with the general terms and conditions within this permit.
- The permittee shall submit to the Cleveland DAQ, by January 31 of each year, an annual emissions report that specifies the total VOC emissions for this emissions unit.

E. Testing Requirements

- 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):
 - Emission Limitation:
VOC emissions shall not exceed 4.7 lbs/hr

Applicable Compliance Method:
Compliance with the above daily emission limitation shall be determined by the record keeping as specified in C.1.
 - Emission Limitation:
VOC emissions shall not exceed 20.5 tons per year

Applicable Compliance Method:
Compliance with yearly emission limitation shall be determined by summing the daily emission rates and dividing by 2000 lbs/ton for each calendar year.
 - Emission Limitation:
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:
Compliance with the VOC limitation above shall be determined from the record keeping as specified in C.1.

Compliance may also be determined by calculating the VOC content in accordance with the equation specified in OAC Rule 3745-21-10(B)(9) for CVOC,2 for the daily volume-weighted average VOC content.

USEPA Method 24 shall be used to determine the VOC contents of the coatings employed.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1318008400 Emissions Unit ID: K002 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>
K002 - Coating booth (east) used to coat fabricated metal parts	OAC rule 3745-31-05(A)(3) (PTI 13-04315 issued 10/12/04)	20.5 TPY VOC 4.7 lbs VOC/hr
	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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

B. Operational Restrictions

- 1. The permittee shall operate the filtration system 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 employed;
 - b. the amount, in gallons, of each coating employed;
 - c. the VOC content of each coating, in pounds per gallon, as applied;
 - d. the VOC content of coatings, in pounds per gallon less water and exempt solvents, as applied;
 - e. the total VOC emission rate for all coatings, in pounds [summation of (b x c) for all coatings];
 - f. hours of operation; and
 - g. average hourly emissions rate, in lbs/hr (e/f).
- 2. The permittee shall collect and record the total VOC emissions from all coatings for this emissions unit for the purpose of determining annual VOC emissions (summation of daily emissions from C.1.e above divided by 2000 lbs/ton).
- 3. The permittee shall maintain daily records and document any time periods when the dry exhaust filtration system was not in service when this emissions unit was in operation.
- 4. The permit to install for this emissions unit K002 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: 2 - Butoxyethonal
 TLV (mg/m3): 96.663
 Maximum Hourly Emission Rate (lbs/hr): 0.97
 Predicted 1-Hour Maximum Ground-Level Concentration(g/m3): 89.27
 MAGLC (g/m3): 2,301.5

Pollutant: sec - butanol
 TLV (mg/m3): 303.15
 Maximum Hourly Emission Rate (lbs/hr): 0.46
 Predicted 1-Hour Maximum Ground-Level Concentration(g/m3): 42.37
 MAGLC (g/m3): 7218

5. 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 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");
 - 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.).
6. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- documentation of the 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 Division of Air Quality (DAQ) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month.
- The permittee shall notify the Cleveland DAQ in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of the record and shall be sent within 30 days after the event occurs.
- The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify each day during which the average hourly VOC emissions from the coating operation exceeded 4.7 lbs VOC/hr. Each report shall be submitted in accordance with the general terms and conditions within this permit.
- The permittee shall submit to the Cleveland DAQ, by January 31 of each year, an annual emissions report that specifies the total VOC emissions for this emissions unit.

E. Testing Requirements

- 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):
 - Emission Limitation:
VOC emissions shall not exceed 4.7 lbs/hr
 - Applicable Compliance Method:
Compliance with the above daily emission limitation shall be determined by the record keeping as specified in C.1.
 - Emission Limitation:
VOC emissions shall not exceed 20.5 tons per year
 - Applicable Compliance Method:
Compliance with yearly emission limitation shall be determined by summing the daily emission rates and dividing by 2000 lbs/ton for each calendar year.
 - Emission Limitation:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance with the VOC limitation above shall be determined from the record keeping as specified in C.1.

Compliance may also be determined by calculating the VOC content in accordance with the equation specified in OAC Rule 3745-21-10(B)(9) for CVOC,2 for the daily volume-weighted average VOC content.

USEPA Method 24 shall be used to determine the VOC contents of the coatings employed.

F. **Miscellaneous Requirements**

1. None