

Facility ID: 1318038490 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 K001](#)
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Facility ID: 1318038490 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 Chair Stain Booth 1	OAC rule 3745-31-05(A)(3) (PTI 13-04640 issued 10/5/06)	7.31 lbs organic compound (OC)/hr and 13.68 tons per year (TPY) OC from coatings/adhesives  0.06 TPY OC from cleanup materials
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.

**2. Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the coating operation: the company identification for each coating/adhesive and cleanup material employed; the amount, in gallons, of each coating/adhesive and cleanup material employed;

- the number of hours that the emissions unit operates;  
 the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;  
 the amount, in gallons, of clean-up material that is contained for disposal;  
 the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];  
 the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b - e)]; and  
 h. the average hourly organic compound emission rate for all coatings/adhesives, in pounds per hour [f / c].

[Note: The coating/adhesive information must be for the coatings/ adhesives as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):  
 the name and identification number of each HAP containing material employed;  
 the individual HAP content for each HAP, in pounds of individual HAP per pound of material;  
 the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];  
 the number of pounds of each HAP containing material employed;  
 the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];  
 the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x d) for each material];  
 the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and  
 the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.

7. The permit to install for this emissions unit 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: Acetone  
 TLV (mg/m3): 1187.12  
 Maximum Hourly Emission Rate (lbs/hr): 2.9  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91  
 MAGLC (ug/m3): 28265  
 Pollutant: Amyl Acetate  
 TLV (mg/m3): 266.26  
 Maximum Hourly Emission Rate (lbs/hr): 0.77  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08  
 MAGLC (ug/m3): 6339  
 Pollutant: 1-Butanol  
 TLV (mg/m3): 60.63  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80  
 MAGLC (ug/m3): 1444  
 Pollutant: n-Butyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 3.25  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68  
 MAGLC (ug/m3): 16968  
 Pollutant: Dichloromethane  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 1.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25  
 MAGLC (ug/m3): 4135  
 Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863  
 Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968  
 Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559  
 Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042  
 Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609  
 Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776  
 Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703  
 Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486  
 Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
 MAGLC (ug/m3): 10338

8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 7.31 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.

6. The permittee shall submit deviation (excursion) reports which include the following information:  
 an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and  
 an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):
- Emission Limitation  
7.31 lbs OC/hr from coatings/adhesives
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.
- Emission Limitation  
0.06 TPY OC from clean-up material
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.
- Emission Limitation  
13.68 TPY OC from coatings/adhesives
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.
- Emission Limitation  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.
- Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
- Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the OC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1318038490 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 Chair Glue Booth 8	OAC rule 3745-31-05(A)(3) (PTI 13-04640 issued 10/5/06)	1.86 lbs organic compound (OC)/hr and 3.48 tons per year (TPY) OC from coatings/adhesives  0.01 TPY OC from cleanup material.  The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	

**2. Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

- 1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
- 2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

- 1. 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.
- 2. The permittee shall collect and record the following information for each day for the coating operation:  
the company identification for each coating/adhesive and cleanup material employed;  
the amount, in gallons, of each coating/adhesive and cleanup material employed;  
the number of hours that the emissions unit operates;  
the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;  
the amount, in gallons, of clean-up material that is contained for disposal;  
the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];  
the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b -e)]; and  
the average hourly organic compound emission rate for all coatings/adhesives, in pounds per hour [f / c].  
  
[Note: The coating/adhesive information must be for the coatings/ adhesives as employed, including any thinning solvents added at the emissions unit.]
- 3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
- 4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
- 5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
- 6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):  
the name and identification number of each HAP containing material employed;  
the individual HAP content for each HAP, in pounds of individual HAP per pound of material;  
the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];  
the number of pounds of each HAP containing material employed;  
the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];  
the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x d) for each material];  
the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.

7. The permit to install for this emissions unit 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: Acetone  
 TLV (mg/m3): 1187.12  
 Maximum Hourly Emission Rate (lbs/hr): 2.9  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91  
 MAGLC (ug/m3): 28265
- Pollutant: Amyl Acetate  
 TLV (mg/m3): 266.26  
 Maximum Hourly Emission Rate (lbs/hr): 0.77  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08  
 MAGLC (ug/m3): 6339
- Pollutant: 1-Butanol  
 TLV (mg/m3): 60.63  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80  
 MAGLC (ug/m3): 1444
- Pollutant: n-Butyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 3.25  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68  
 MAGLC (ug/m3): 16968
- Pollutant: Dichloromethane  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 1.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25  
 MAGLC (ug/m3): 4135
- Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863
- Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968
- Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559
- Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042
- Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609
- Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776
- Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703
- Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486
- Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
 MAGLC (ug/m3): 10338

8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 1.86 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
6. The permittee shall submit deviation (excursion) reports which include the following information:  
 an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and  
 an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):  
 Emission Limitation  
 1.86 lbs OC/hr from coatings/adhesives  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.  
 Emission Limitation  
 0.01 TPY OC from clean-up material  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
 Emission Limitation  
 3.48 TPY OC from coatings/adhesives  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
 None

Emission Limitation

HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

Emission Limitation

HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

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

F. **Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1318038490 Emissions Unit ID: K003 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>
K003 - Chair Top Coat Booth 3	OAC rule 3745-31-05(A)(3) (PTI 13-04640 issued 10/5/06)	6.97 lbs organic compound (OC)/hr and 13.05 tons per year (TPY) OC from coatings/adhesives  0.06 TPY OC from cleanup material.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.

2. **Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the coating operation:
  - the company identification for each coating/adhesive and cleanup material employed;
  - the amount, in gallons, of each coating/adhesive and cleanup material employed;
  - the number of hours that the emissions unit operates;
  - the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;
  - the amount, in gallons, of clean-up material that is contained for disposal;
  - the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];
  - the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b -e)]; and
  - the average hourly organic compound emission rate for all coatings/ adhesives, in pounds per hour [f / c].

[Note: The coating/adhesive information must be for the coatings/adhesives as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):
  - the name and identification number of each HAP containing material employed;
  - the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
  - the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];
  - the number of pounds of each HAP containing material employed;
  - the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];
  - the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x d) for each material];
  - the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.

7. The permit to install for this emissions unit 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: Acetone
    - TLV (mg/m3): 1187.12
    - Maximum Hourly Emission Rate (lbs/hr): 2.9
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91
    - MAGLC (ug/m3): 28265
  - Pollutant: Amyl Acetate
    - TLV (mg/m3): 266.26
    - Maximum Hourly Emission Rate (lbs/hr): 0.77
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08
    - MAGLC (ug/m3): 6339
  - Pollutant: 1-Butanol
    - TLV (mg/m3): 60.63
    - Maximum Hourly Emission Rate (lbs/hr): 1.24
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80
    - MAGLC (ug/m3): 1444
  - Pollutant: n-Butyl Acetate
    - TLV (mg/m3): 712.64
    - Maximum Hourly Emission Rate (lbs/hr): 3.25
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68
    - MAGLC (ug/m3): 16968
  - Pollutant: Dichloromethane
    - TLV (mg/m3): 173.68
    - Maximum Hourly Emission Rate (lbs/hr): 1.93
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25

MAGLC (ug/m3): 4135  
 Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863  
 Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968  
 Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559  
 Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042  
 Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609  
 Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776  
 Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703  
 Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486  
 Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
 MAGLC (ug/m3): 10338

8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 6.97 pounds per hour, and the actual average hourly organic compound emission

rate for each such day.

3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and
  - an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):
  - Emission Limitation  
6.97 lbs OC/hr from coatings/adhesives
  - Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.
  - Emission Limitation  
0.06 TPY OC from clean-up material
  - Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.
  - Emission Limitation  
13.05 TPY OC from coatings/adhesives
  - Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.
  - Emission Limitation  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.
  - Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.
  - Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.
  - Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
  - Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.
  - Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the OC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1318038490 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>
K004 - Chair Shading/Inspection Booth 4	OAC rule 3745-31-05(A)(3) (PTI 13-04655 issued 10/5/06)	7.31 lbs/organic compound (OC)/hr and 13.68 tons per year (TPY) OC from coatings/adhesives.  0.06 TPY OC from cleanup materials.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.

**2. Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the coating operation:
  - the company identification for each coating/adhesive and cleanup material employed;
  - the amount, in gallons, of each coating/adhesive and cleanup material employed;
  - the number of hours that the emissions unit operates;
  - the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;
  - the amount, in gallons, of clean-up material that is contained for disposal;
  - the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];
  - the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b -e)]; and
  - the average hourly organic compound emission rate for all coatings/adhesives, in pounds per hour [f / c].

[Note: The coating/adhesive information must be for the coatings/adhesives as employed, including any thinning solvents added at the emissions unit.]
3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.

6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):  
 the name and identification number of each HAP containing material employed;  
 the individual HAP content for each HAP, in pounds of individual HAP per pound of material;  
 the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];  
 the number of pounds of each HAP containing material employed;  
 the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];  
 the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x d) for each material];  
 the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI;  
 and  
 the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- \*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.
7. The permit to install for this emissions unit 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: Acetone  
 TLV (mg/m3): 1187.12  
 Maximum Hourly Emission Rate (lbs/hr): 2.9  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91  
 MAGLC (ug/m3): 28265
- Pollutant: Amyl Acetate  
 TLV (mg/m3): 266.26  
 Maximum Hourly Emission Rate (lbs/hr): 0.77  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08  
 MAGLC (ug/m3): 6339
- Pollutant: 1-Butanol  
 TLV (mg/m3): 60.63  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80  
 MAGLC (ug/m3): 1444
- Pollutant: n-Butyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 3.25  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68  
 MAGLC (ug/m3): 16968
- Pollutant: Dichloromethane  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 1.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25  
 MAGLC (ug/m3): 4135
- Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863
- Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968
- Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559
- Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042
- Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609
- Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776

## Pollutant: 2-Propanol

TLV (mg/m3): 491.53

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01

MAGLC (ug/m3): 11703

## Pollutant: Toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 2.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12

MAGLC (ug/m3): 4486

## Pollutant: Xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 1.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43

MAGLC (ug/m3): 10338

8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 7.31 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and
  - an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):
  - Emission Limitation
  - 7.31 lbs OC/hr from coatings/adhesives

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.

Emission Limitation  
0.06 TPY OC from clean-up material

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.

Emission Limitation  
13.68 TPY OC from coatings/adhesives

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.

Emission Limitation  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.

Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

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

F. **Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1318038490 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>
K005 - Desk Stain Booth 5	OAC rule 3745-31-05(A)(3) (PTI 13-04655 issued 10/5/06)	7.31 lbs/organic compound (OC)/hr and 13.68 tons per year (TPY) OC from coatings/adhesives.

0.06 TPY OC from cleanup materials.

The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C).

Exempt. See A.2.a below.

See A.2.b, A.2.c, and B.2 below.

OAC rule 3745-21-07(G)(2)

OAC rule 3745-31-05(C)

Synthetic Minor to avoid Title V,

MACT subpart JJ, and

Nonattainment NSR

**2. Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the coating operation:
  - the company identification for each coating/adhesive and cleanup material employed;
  - the amount, in gallons, of each coating/adhesive and cleanup material employed;
  - the number of hours that the emissions unit operates;
  - the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;
  - the amount, in gallons, of clean-up material that is contained for disposal;
  - the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];
  - the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b -e)]; and
  - the average hourly organic compound emission rate for all coatings/ adhesives, in pounds per hour [f / c].

[Note: The coating/adhesive information must be for the coatings/adhesives as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):
  - the name and identification number of each HAP containing material employed;
  - the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
  - the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];
  - the number of pounds of each HAP containing material employed;
  - the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];
  - the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x d) for each material];
  - the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.

7. The permit to install for this emissions unit 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: Acetone  
TLV (mg/m3): 1187.12

- Maximum Hourly Emission Rate (lbs/hr): 2.9  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91  
 MAGLC (ug/m3): 28265  
 Pollutant: Amyl Acetate  
 TLV (mg/m3): 266.26  
 Maximum Hourly Emission Rate (lbs/hr): 0.77  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08  
 MAGLC (ug/m3): 6339  
 Pollutant: 1-Butanol  
 TLV (mg/m3): 60.63  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80  
 MAGLC (ug/m3): 1444  
 Pollutant: n-Butyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 3.25  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68  
 MAGLC (ug/m3): 16968  
 Pollutant: Dichloromethane  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 1.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25  
 MAGLC (ug/m3): 4135  
 Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863  
 Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968  
 Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559  
 Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042  
 Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609  
 Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776  
 Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703  
 Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486  
 Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
 MAGLC (ug/m3): 10338
8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 7.31 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
6. The permittee shall submit deviation (excursion) reports which include the following information:  
 an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and  
 an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):  
 Emission Limitation  
 7.31 lbs OC/hr from coatings/adhesives  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.  
 Emission Limitation  
 0.06 TPY OC from clean-up material  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
 Emission Limitation  
 13.68 TPY OC from coatings/adhesives  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
 Emission Limitation  
 OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.  
 Emission Limitation  
 HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.  
  
 Applicable Compliance Method  
 Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.  
 Emission Limitation  
 HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

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

F. **Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1318038490 Emissions Unit ID: K006 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>
K006 - Desk Sealer Booth 6	OAC rule 3745-31-05(A)(3) (PTI 13-04655 issued 10/5/06)	7.31 lbs/organic compound (OC)/hr and 13.68 tons per year (TPY) OC from coatings/adhesives.  0.06 TPY OC from cleanup materials.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.

2. **Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

B. **Operational Restrictions**

1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

C. **Monitoring and/or Record Keeping Requirements**

1. 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.

2. The permittee shall collect and record the following information for each day for the coating operation:
  - the company identification for each coating/adhesive and cleanup material employed;
  - the amount, in gallons, of each coating/adhesive and cleanup material employed;
  - the number of hours that the emissions unit operates;
  - the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;
  - the amount, in gallons, of clean-up material that is contained for disposal;
  - the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of  $b \times d$ ];
  - the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of  $d(b - e)$ ]; and
  - the average hourly organic compound emission rate for all coatings/adhesives, in pounds per hour [ $f / c$ ].

[Note: The coating/adhesive information must be for the coatings/adhesives as employed, including any thinning solvents added at the emissions unit.]
3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):
  - the name and identification number of each HAP containing material employed;
  - the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
  - the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];
  - the number of pounds of each HAP containing material employed;
  - the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of  $(b \times d)$  for each material];
  - the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of  $(c \times d)$  for each material];
  - the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.
7. The permit to install for this emissions unit 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: Acetone
    - TLV (mg/m3): 1187.12
    - Maximum Hourly Emission Rate (lbs/hr): 2.9
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91
    - MAGLC (ug/m3): 28265
  - Pollutant: Amyl Acetate
    - TLV (mg/m3): 266.26
    - Maximum Hourly Emission Rate (lbs/hr): 0.77
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08
    - MAGLC (ug/m3): 6339
  - Pollutant: 1-Butanol
    - TLV (mg/m3): 60.63
    - Maximum Hourly Emission Rate (lbs/hr): 1.24
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80
    - MAGLC (ug/m3): 1444
  - Pollutant: n-Butyl Acetate
    - TLV (mg/m3): 712.64
    - Maximum Hourly Emission Rate (lbs/hr): 3.25
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68
    - MAGLC (ug/m3): 16968
  - Pollutant: Dichloromethane
    - TLV (mg/m3): 173.68
    - Maximum Hourly Emission Rate (lbs/hr): 1.93
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25
    - MAGLC (ug/m3): 4135
  - Pollutant: Ethanol
    - TLV (mg/m3): 1884.25
    - Maximum Hourly Emission Rate (lbs/hr): 1.02
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06
    - MAGLC (ug/m3): 44863
  - Pollutant: Isobutyl Acetate
    - TLV (mg/m3): 712.64
    - Maximum Hourly Emission Rate (lbs/hr): 7.09
    - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01
    - MAGLC (ug/m3): 16968

## Pollutant: MAK

TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559  
 Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042  
 Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609  
 Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776  
 Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703  
 Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486  
 Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
 MAGLC (ug/m3): 10338

8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 7.31 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-

month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.

6. The permittee shall submit deviation (excursion) reports which include the following information:  
 an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and  
 an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):  
 Emission Limitation  
 7.31 lbs OC/hr from coatings/adhesives

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.

Emission Limitation  
 0.06 TPY OC from clean-up material

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.

Emission Limitation  
 13.68 TPY OC from coatings/adhesives

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.

Emission Limitation  
 OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.

Emission Limitation  
 HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

Emission Limitation  
 HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.

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

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1318038490 Emissions Unit ID: K007 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>
K007 - Desk Top Coat Booth 7	OAC rule 3745-31-05(A)(3) (PTI 13-04655 issued 10/5/06)	7.31 lbs/organic compound (OC)/hr and 13.68 tons per year (TPY) OC from coatings/adhesives.  0.06 TPY OC from cleanup materials.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.

**2. Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.  
The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

- 1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
- 2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

- 1. 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.
- 2. The permittee shall collect and record the following information for each day for the coating operation:
  - the company identification for each coating/adhesive and cleanup material employed;
  - the amount, in gallons, of each coating/adhesive and cleanup material employed;
  - the number of hours that the emissions unit operates;
  - the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;
  - the amount, in gallons, of clean-up material that is contained for disposal;
  - the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];
  - the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b -e)]; and
  - the average hourly organic compound emission rate for all coatings/ adhesives, in pounds per hour [f / c].

[Note: The coating/adhesive information must be for the coatings/adhesives as employed, including any thinning solvents added at the emissions unit.]
- 3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
- 4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
- 5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
- 6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):
  - the name and identification number of each HAP containing material employed;
  - the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
  - the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];
  - the number of pounds of each HAP containing material employed;
  - the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];
  - the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x

d) for each material];

the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.

7. The permit to install for this emissions unit 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: Acetone  
 TLV (mg/m3): 1187.12  
 Maximum Hourly Emission Rate (lbs/hr): 2.9  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91  
 MAGLC (ug/m3): 28265  
 Pollutant: Amyl Acetate  
 TLV (mg/m3): 266.26  
 Maximum Hourly Emission Rate (lbs/hr): 0.77  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08  
 MAGLC (ug/m3): 6339  
 Pollutant: 1-Butanol  
 TLV (mg/m3): 60.63  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80  
 MAGLC (ug/m3): 1444  
 Pollutant: n-Butyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 3.25  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68  
 MAGLC (ug/m3): 16968  
 Pollutant: Dichloromethane  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 1.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25  
 MAGLC (ug/m3): 4135  
 Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863  
 Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968  
 Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559  
 Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042  
 Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609  
 Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776  
 Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703  
 Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486  
 Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
MAGLC (ug/m3): 10338

8. 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.)

9. 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 submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
- The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 7.31 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
- The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
- The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
- The permittee shall submit deviation (excursion) reports which include the following information:  
an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and  
an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

#### 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  
7.31 lbs OC/hr from coatings/adhesives  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.  
Emission Limitation  
0.06 TPY OC from clean-up material  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
Emission Limitation  
13.68 TPY OC from coatings/adhesives  
  
Applicable Compliance Method

- Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.
- Emission Limitation  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.
- Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
- Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.
- Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the OC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1318038490 Emissions Unit ID: K008 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>
K008 - Chair Sealer Booth 2	OAC rule 3745-31-05(A)(3) (PTI 13-04655 issued 10/5/06)	7.31 lbs/organic compound (OC)/hr and 13.68 tons per year (TPY) OC from coatings/adhesives.  0.06 TPY OC from cleanup materials.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT subpart JJ, and Nonattainment NSR	The requirements of this rule also include compliance with OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Exempt. See A.2.a below. See A.2.b, A.2.c, and B.2 below.

**2. Additional Terms and Conditions**

- (a) The permittee shall not use photochemically reactive materials as coatings, adhesives or for cleanup

purposes in this emissions unit and shall comply with the above cited hourly and annual limitations as BAT.

The emissions of hazardous air pollutants (HAPs) from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 9.0 TPY for any single HAP and 20.0 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 TPY based upon a rolling, 12-month summation of emissions.

**B. Operational Restrictions**

1. The permittee shall operate the fiberglass filtration system whenever the emissions unit is in operation.
2. The maximum annual operating hours for each emissions unit shall not exceed 3744, based upon a rolling, 12-month summation of the operating hours.

**C. Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the coating operation:
  - the company identification for each coating/adhesive and cleanup material employed;
  - the amount, in gallons, of each coating/adhesive and cleanup material employed;
  - the number of hours that the emissions unit operates;
  - the organic compound content of each coating/adhesive and cleanup material, in pounds per gallon;
  - the amount, in gallons, of clean-up material that is contained for disposal;
  - the total organic compound emission rate for all coatings/adhesives, in pounds per day [sum of b x d];
  - the total organic compound emissions rate for all cleanup materials, in pounds per day [sum of d(b - e)]; and
  - the average hourly organic compound emission rate for all coatings/ adhesives, in pounds per hour [f / c].

[Note: The coating/adhesive information must be for the coatings/adhesives as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall record the sum of the daily emissions determined from C.2.f and C.2.g above for the purpose of determining annual organic compound emissions from coatings/adhesives and cleanup materials.
4. The permittee shall collect and record from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, on a monthly basis, the rolling, 12-month summation of OC emissions in tons per year for all coatings/adhesives and cleanup materials. This shall include information for the current month and the preceding eleven calendar months.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours.
6. The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002, K003, K004, K005, K006, K007, and K008):
  - the name and identification number of each HAP containing material employed;
  - the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
  - the total combined HAP content, in pounds of combined HAPs per pound of material [sum of all the individual HAP contents from b];
  - the number of pounds of each HAP containing material employed;
  - the total individual HAP usage for each HAP from all HAP containing material, in pounds or tons per month [for each HAP, the sum of (b x d) for each material];
  - the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c x d) for each material];
  - the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include information for the current month and the preceding eleven calendar months.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). This information does not have to be kept on an individual basis.

7. The permit to install for this emissions unit 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: Acetone  
 TLV (mg/m3): 1187.12  
 Maximum Hourly Emission Rate (lbs/hr): 2.9  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 312.91  
 MAGLC (ug/m3): 28265  
 Pollutant: Amyl Acetate  
 TLV (mg/m3): 266.26  
 Maximum Hourly Emission Rate (lbs/hr): 0.77  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.08  
 MAGLC (ug/m3): 6339  
 Pollutant: 1-Butanol  
 TLV (mg/m3): 60.63  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.80  
 MAGLC (ug/m3): 1444  
 Pollutant: n-Butyl Acetate

TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 3.25  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.68  
 MAGLC (ug/m3): 16968  
 Pollutant: Dichloromethane  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 1.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.25  
 MAGLC (ug/m3): 4135  
 Pollutant: Ethanol  
 TLV (mg/m3): 1884.25  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110.06  
 MAGLC (ug/m3): 44863  
 Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 712.64  
 Maximum Hourly Emission Rate (lbs/hr): 7.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 765.01  
 MAGLC (ug/m3): 16968  
 Pollutant: MAK  
 TLV (mg/m3): 233.5  
 Maximum Hourly Emission Rate (lbs/hr): 0.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71.21  
 MAGLC (ug/m3): 5559  
 Pollutant: MEK  
 TLV (mg/m3): 589.78  
 Maximum Hourly Emission Rate (lbs/hr): 1.49  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 160.77  
 MAGLC (ug/m3): 14042  
 Pollutant: 2-Methyl-1-Propanol  
 TLV (mg/m3): 151.57  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 463.97  
 MAGLC (ug/m3): 3609  
 Pollutant: 1-Methoxy-2-Propanol  
 TLV (mg/m3): 368.59  
 Maximum Hourly Emission Rate (lbs/hr): 4.12  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 444.55  
 MAGLC (ug/m3): 8776  
 Pollutant: 2-Propanol  
 TLV (mg/m3): 491.53  
 Maximum Hourly Emission Rate (lbs/hr): 1.14  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123.01  
 MAGLC (ug/m3): 11703  
 Pollutant: Toluene  
 TLV (mg/m3): 188.4  
 Maximum Hourly Emission Rate (lbs/hr): 2.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 302.12  
 MAGLC (ug/m3): 4486  
 Pollutant: Xylene  
 TLV (mg/m3): 434.2  
 Maximum Hourly Emission Rate (lbs/hr): 1.32  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 142.43  
 MAGLC (ug/m3): 10338

8. 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.)
9. 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**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the filtration system was not in service when the emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which include the following information: an identification of each day during which the average hourly organic compound emissions from coatings/adhesives exceeded 7.31 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
3. The permittee shall also submit annual reports which specify the total organic compound emissions from coatings/adhesives and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
6. The permittee shall submit deviation (excursion) reports which include the following information:  
an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and  
an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 20.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**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):  
Emission Limitation  
7.31 lbs OC/hr from coatings/adhesives  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.2 and D.2 above, respectively.  
Emission Limitation  
0.06 TPY OC from clean-up material  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
Emission Limitation  
13.68 TPY OC from coatings/adhesives  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.3 and D.3 above, respectively.  
Emission Limitation  
OC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008 shall not exceed 96.0 tons per year based upon a rolling, 12-month summation of emissions.  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting in sections C.4 and D.5 above, respectively.  
Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 9.0 tpy for any single HAP.  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.  
Emission Limitation  
HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 20.0 tpy for any combination of HAPs.  
  
Applicable Compliance Method  
Compliance shall be determined from the record keeping and reporting sections C.6 and D.6 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the OC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

**F. Miscellaneous Requirements**

1. None