

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install: **15-01639**

**A. Source Description**

This facility consists of (3) identical paint spray booths (K001 - K003) for coating of miscellaneous metal parts. A burn-off oven with afterburner (N001) is used to incinerate the coating off of the parts hooks for re-use. Ajax TOCCO Magnethermic acquired ownership of the facility in Dec. 2005. The facility is located Lake township, Stark county. It has been operating without an air permit since Jan. 2006.

**B. Facility Emissions and Attainment Status**

Stark county is classified as nonattainment for ozone NAAQS and nonttainment for PM2.5. Without synthetic minor restrictions presented in this permit, the facility would be a major source of VOC's, individual HAP's, and combined HAP's, and would also be subject to 40 CFR 63, Subpart Mmmm , MACT for surface coating of miscellaneous metal parts.

**C. Source Emissions**

BAT will apply to the emission units regardless of whether the 10 tpy controlled potential to emit values are exceeded because the units were installed before the SB 265 effective date of Aug. 3, 2006.

The coatings applied in the spray booths (K001 - K003) will be either extreme performance paint or adhesive coatings that will be thinned solely with toluene . The coatings as applied will exceed the maximum 3.5 lb VOC/gal limitations required by 3745- 21-09(U)(1)(c). The applicant has accordingly requested a 10 gal/day limit required by 3745- 21-09(U)(2)(e)(iii) to be exempt from the 3.5 lb VOC/gal limit.

To simplify record keeping, the Applicant does not want to differentiate between toluene used for cleanup and toluene used as paint thinner, nor does the Applicant wish to distinguish between paint coating and adhesive coating. Thus the 10 gal/day limit in the Permit includes the total daily amounts of all material used in the spray booth (toluene used for thinner, toluene used for cleanup, paint, and adhesive coating). The Applicant has further proposed voluntary restrictions of such that usage of paint, adhesive, and toluene will not exceed 1 ga/hr each per booth. In addition, the Applicant has submitted voluntary annual usage restrictions as follows:

Annual toluene use (for thinner and cleanup):	2750 gal/yr
Annual paint use (before thinning) :	900 gal/yr
Annual adhesive use (before thinning)	3650 gal/yr

The Applicant has submitted SCRn 3 dispersion modeling of air toxic emissions at a worst case condition of 7.2 lb toluene/hr emitting simultaneously from each of the 3 paint booth stacks. The modeling results predicted a 1-hour maximum ground level concentration of about 1/10 of the Maximum Acceptable Ground-Level Concentration (MAGLC) for toluene. Other Air Toxics in the paint MSDS sheets are Xylene (emitted at 3.7 lb/hr), Ethyl Benzene (emitted at 1.1 lb/hr. These were included in the Permit to trigger a review if the paint toxic properties change in the future. The total dipropylene glycol emitted from the paint by all 3 booth is less than 1 tpy and did not require modeling.

The burn-off oven (N001) would be de-minimus ( all emissions less than 10 lb/day) if not for OAC rule 3745-17-09(B) for incinerators which limits PM emissions to 0.20 lb PM/ 100 lb material regardless of the 10 lb/day trigger.

**D. Conclusion**

The permit is written as a synthetic minor permit and contains federally enforceable limits with adequate operational restrictions, record keeping, and reporting requirements to ensure the facility will not exceed threshold emissions limitations for VOC's and HAP's, avoiding major source or Title V status. Accordingly the facility will also be exempt from 40 CFR 63, Subpart Mmmm , MACT for surface coating of miscellaneous metal parts.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
STARK COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 15-01639

**Fac ID:** 1576171949

**DATE:** 11/22/2006

AjaxTOCCO Magnethermic  
Dave Flanigan  
8984 Meridian Circle NW  
N. Canton, OH 44720

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

Canton LAA

Stark Co. Area Trans. Study

WV

PA

**STARK COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 15-01639 FOR AN AIR CONTAMINANT SOURCE FOR  
AjaxTOCCO Magnethermic**

On 11/22/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **AjaxTOCCO Magnethermic**, located at **8984 Meridian Circle NW, N. Canton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 15-01639:

**Synthetic minor PTI for paint spray booths K001,K002,K003, and burn-off oven N001.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dan Aleman, Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544 [(330)489-3385]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 15-01639**

Application Number: 15-01639  
Facility ID: 1576171949  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: AjaxTOCCO Magnethermic  
Person to Contact: Dave Flanigan  
Address: 8984 Meridian Circle NW  
N. Canton, OH 44720

Location of proposed air contaminant source(s) [emissions unit(s)]:

**8984 Meridian Circle NW  
N. Canton, Ohio**

Description of proposed emissions unit(s):

**Synthetic minor PTI for paint spray booths K001,K002,K003, and burn-off oven N001.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

AjaxTOCCO Magnethermic

PTI Application: 15-01639

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1576171949

## **A. Permit to Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

**AjaxTOCCO Magnethermic**

**Facility ID: 1576171949**

**PTI Application: 15-01639**

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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## 9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

## 10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## 11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

## 12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

**AjaxTOCCO Magnethermic**

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VOC	36.3
Single HAP	9.9
Combined HAP's	24.9
PE	2.5

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (K001) - Paint booth 1A for coating misc. metal parts. Equipped with dry filter system.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions for this unit from coatings (paint and adhesive), thinner (toluene), and cleanup material (toluene) shall not exceed a total of 12.11 pounds per hour and 72 pounds per day.</p> <p>See Section A.2.b. and Section B.I.</p> <p>Visible particulate emissions from any stack shall not exceed 0 percent opacity, as a six-minute average.</p> <p>Particulate Emissions (PE) shall not exceed 0.551 pound per hour.</p> <p>Particulate Emissions (PE) shall not exceed 2.41 tons per year.</p> <p>See Section A.2.a. and Section B.2.</p>
OAC rule 3745-21-09(U)(2)(e)(iii)	Total combined usage of coatings, thinner, and cleanup material, for this emissions unit shall not exceed 10 gal/day. See Section A.2.c below.
OAC rule 3745-35-07(B)(1) (Synthetic minor to avoid Title V and MACT)	See Section A.2.d,e,f below.
OAC rule 3745-17-07(A)	The requirements established pursuant to this rule are less stringent than the visible emission limitation included in OAC rule 3745-31-05(A)(3) .

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OAC rule 3745-17-11(B)(1)	The PE limitation established pursuant to this rule is equivalent to the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
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**2. Additional Terms and Conditions**

- 2.a** Compliance with Best Available Technology, OAC rule 3745-31-05(A)(3), shall be demonstrated by the use of a booth and dry filter system for overspray control, short and long term limits on paint, thinner, adhesive, and cleanup material usage, and compliance with emissions limitations established in Section A.1.
- 2.b** The 12.11 pounds per hour VOC limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c** OAC rule 3745-21-09(U)(2)(e)(iii) exempts the source from the requirements of OAC-3745-21-09(U)(1)(c) which would limit VOC emissions to a maximum of 3.5 lbs VOC/gal of coating .
- 2.d** VOC emissions from this emissions unit from coatings, thinner, and cleanup material usage shall not exceed 12.1 tons per rolling, 12-month period.
- 2.e** Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 9.9 tons per rolling, 12-month period.
- 2.f** Emissions of all HAPs from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 24.9 tons per rolling, 12-month period
- 2.g** This emissions unit is not subject to 40 CFR Part 63, Subpart M (MACT for Surface Coating of Miscellaneous Metal Parts) because the facility is not a major source for HAPs as established by the restrictions in 2.e and 2.f above.

**B. Operational Restrictions**

- 1. The permit limits for VOC and HAP emissions are based on the permittee's use of

Emissions Unit ID: **K001**

toluene only for thinner and cleanup. Use of any other material containing VOC's or HAP's is prohibited, without prior approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall operate the dry filtration system for control of particulate emissions in accordance with the manufacturer's recommendations whenever this emissions unit is in operation.
3. The following average material usage rates shall not be exceeded for this emissions unit:

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paint : 1 gal/hour

toluene (whether used as thinner or for cleanup): 1 gal/hour

adhesive: 1 gal/hour

4. To ensure enforceability of the 10 gallon per day combined usage limit for coatings (paint and adhesive), thinner (toluene), and cleanup material (toluene), during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly usage levels specified in the following table for this emissions unit:

<u>Month</u>	<u>Paint usage Gallons</u>	<u>toluene usage Gallons</u>	<u>Total amount of paint, toluene, and adhesive used, Gallons</u>
1	75	230	305
1-2	150	460	610
1-3	225	690	915
1-4	300	920	1220
1-5	375	1150	1525
1-6	450	1380	1830
1-7	525	1610	2135
1-8	600	1840	2440
1-9	675	2070	2745
1-10	750	2300	3050
1-11	825	2530	3355
1-12	900	2750	3650

After the first 12 calendar months of operation following the issuance of this permit, compliance with the combined, usage limits for this emissions unit shall be based upon a rolling 12-month summation of the monthly usage figures recorded in each column of the above table.

5. To ensure enforceability of the HAP emission limits during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly emissions levels specified in the following table for the combined emissions of K001, K002, K003:

<u>Total HAP Emissions (K001,K002, K003)</u>	<u>Individual HAP Emissions (K001,K002, K003)</u>
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<u>Month</u>	<u>Combined), Tons</u>	<u>Combined), Tons</u>
1	2.1	0.9
1-2	4.2	1.7
1-3	6.3	2.6
1-4	8.4	3.4
1-5	10.5	4.3
1-6	12.6	5.1
1-7	14.7	6.0
1-8	16.8	6.8
1-9	18.9	7.7
1-10	20.9	8.5
1-11	22.9	9.4
1-12	24.9	9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the individual HAP and total HAP, combined, emission limitations for all emissions units at the facility shall be based upon a rolling 12-month summation of the monthly emission figures recorded in each column of the above table.

6. To ensure enforceability of the VOC emission limit during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly emissions levels specified in the following table for this emissions unit:

<u>Month</u>	<u>Tons</u>	VOC Emissions,
1	1	
1-2	2	
1-3	3	
1-4	4	
1-5	5	
1-6	6	
1-7	7	
1-8	8	
1-9	9	
1-10	10	
1-11	11	
1-12	12.1	

Emissions Unit ID: **K001**

After the first 12 calendar months of operation following the issuance of this permit, compliance with the VOC emission limitations for this emissions unit shall be based upon a rolling, 12-month summation of the monthly emission figures .

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for this emissions unit. (Note that the coating can be either paint or adhesive):
  - a. The name and identification number of each coating used.
  - b. The name and identification number of toluene cleanup material used.
  - c. The number of gallons of each coating used, without toluene thinner.
  - d. The number of gallons of each coating used, as applied, including toluene thinner.
  - e. The number of gallons of toluene cleanup material used.
  - f. The VOC content, in pounds per gallon, of each coating used, as applied, including toluene thinner.
  - g. The VOC content, in pounds per gallon, of toluene cleanup material employed.
  - h. The total VOC emissions for all coatings used, in pounds. [ the sum of (d) times (f) for each coating used].
  - i. The total VOC emissions for toluene cleanup material used, in pounds. [ the sum of (e) times (g) ].
  - j. The total VOC emissions for all coatings and toluene cleanup material used, in pounds. [ the sum of (h) and (i) ].
  - k. The total amount of paint, adhesive, and toluene from all coatings and cleanup material used, in gallons [ the sum of (d) and (e) ].
  - l. The total number of hours the emissions unit was in operation.

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- m. The average hourly usage rate of each coating and of toluene in gallons per hour, calculated by dividing the total daily volume of each coating ( unthinned paint or adhesive) used and the total daily volume of toluene used by the number of hours the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit. (Note that the coating can be either paint or adhesive):
    - a. The name and identification number of each coating used.
    - b. The name and identification number of each cleanup material used.
    - c. The number of gallons of each coating used, as applied, including thinner.
    - d. The number of gallons of toluene cleanup material used.
    - e. The VOC content, in pounds per gallon, of each coating used, including thinner.
    - f. The VOC content, in pounds per gallon, of toluene cleanup material employed.
    - g. The total VOC emissions for all coatings used, in pounds [ the sum of (c) times (e) for each coating used].
    - h. The total VOC emissions for all cleanup toluene used, in pounds [ the sum of (d) times (f) for toluene cleanup material used].
    - i. The total VOC emissions for all coatings and toluene cleanup materials used, in tons [ the sum of (g) and (h) ] divided by 2000.
    - j. The rolling 12-month summation of the total VOC emissions from all coatings and toluene cleanup materials used, in tons [ the sum of (i) for the previous 12 calendar months].
    - k. The amount of paint used (unthinned), in gallons.
    - l. The amount of toluene used ( for thinner and cleanup), in gallons.
    - m. The amount of adhesive used (unthinned), in gallons.
    - n. The total amount of paint, adhesive, and toluene from all coatings and cleanup

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- material used, in gallons [ the sum of (c) and (d) ] or [the sum of (k), (l), (m) ].
- o. The rolling, 12-month summation of the total amount of paint (unthinned) used, in gallons [ the sum of (k) for the previous 12 calendar months].
  - p. The rolling, 12-month summation of the total amount of toluene used ( for thinner and cleanup) , in gallons [ the sum of (l) for the previous 12 calendar months].
  - q. The rolling, 12-month summation of the total amount of paint, adhesive, and toluene from all coatings and cleanup material used, in gallons [ the sum of (n) for the previous 12 calendar months].
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, combined as a group. (Note that the coating can be either paint or adhesive):
- a. The name and identification number of each coating used.
  - b. The name and identification number of toluene cleanup material used.
  - c. The number of gallons of each coating used.
  - d. The number of gallons of toluene cleanup material used.
  - e. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material used.
  - g. The total individual HAP emissions from all coatings used, in pounds [for each HAP, the sum of (c) times (e) for each coating used].
  - h. The total individual HAP emissions from all cleanup material used, in pounds [for each HAP, the sum of (d) times (f) for each cleanup material used] .
  - i. The total individual HAP emissions from all coatings and cleanup materials used, in tons [ the sum of (g) and (h)] divided by 2000.
  - j. The total combined HAP's content of each coating, in pounds of combined HAP's per gallon of coating, as applied.

Emissions Unit ID: **K001**

- k. The total combined HAP's content of each cleanup material, in pounds of combined HAP's per gallon of cleanup material, as applied [ sum of all individual HAP contents from (f).
- l. The total combined HAPs emissions from all coatings and cleanup materials used, in tons [ the sum of (j) and (k)] divided by 2000.
- m. The rolling 12-month summation of individual HAP emissions from all coatings and cleanup materials used, in tons [ the sum of (i) for the previous 12 calendar months].
- n The rolling 12-month summation of the total combined HAPs emissions from all coatings and cleanup materials used, in tons [ the sum of (l) for the previous 12 calendar months].
5. The permit to install for emissions units K001, K002, and K003 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" pollutants:

Pollutant	Maximum emission rate per spray booth	TLV, ug/m <sup>3</sup>	MAGLC (TLV/42), ug/m <sup>3</sup>	Predicted 1-hour maximum ground level concentration, ug/m <sup>3</sup> , K001, K002, K003 combined
Toluene	7.2 lb/hr 0.91 g/sec	188,412	4,486	451 ug/m <sup>3</sup>
Xylene	3.7 lb/hr 0.47 g/sec	343,000	8,167	233 ug/m <sup>3</sup>
Ethyl Benzene	1.1 lb/hr 0.14 g/sec	434,000	10,333	70 ug/m <sup>3</sup>

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6. Physical changes to or changes in the method of operation of any of the emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to any of the emissions units or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new

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pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that:
  - a. the dry filtration system was not in service while this emissions unit was in operation.
  - b. this emissions unit employed more than the applicable maximum daily combined ( paint, adhesive, thinner, and cleanup material) usage limit of 10 gallons per day.

Each of the notifications shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information for this emissions unit:
  - a. an identification of each day during which the VOC emissions for this emissions unit from the application of coatings, thinner, and cleanup material exceeded 72 pounds per day), and the actual calculated emissions for each such day.
  - b. an identification of each day during which any of the following short term maximum average material usage rates for this unit were exceeded: 1 gallon per hour paint (unthinned), 1 gallon per hour toluene (whether used as thinner or for cleanup), or 1 gallon per hour adhesive (unthinned).
  - c. An identification of all exceedances of the rolling, 12-month material usage limitations for this unit and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative material usage limitations

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for this unit set forth in Section B.4. of this permit.

- d. For K001, K002, and K003 combined as a group, an identification of all exceedances of the rolling 12-month individual HAP emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative individual HAP limitations set forth in Section B.5. of this permit.
  - e. For K001, K002, and K003 combined as a group, an identification of all exceedances of the rolling 12-month total HAPs emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative total HAPs emissions limitations set forth in Section B.5. of this permit.
  - f. An identification of all exceedances of the rolling 12-month VOC emission limitations for this unit and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC emissions limitations for this unit set forth in Section B.6. of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. and Section A.2. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 12.11 lb/hr and 72 lb/ day.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitations shall be demonstrated by summing the maximum hourly VOC emissions rates from the coatings and the toluene. The coating VOC emissions rate may be determined by multiplying the maximum hourly paint usage of (1) gal/hr by the maximum VOC content of 4.9 lb VOC /gal paint plus the maximum hourly adhesive usage of (1) gal/hr multiplied by the maximum VOC content of 0.01 lb VOC /gal adhesive. The toluene VOC emissions rate may be determined by multiplying the maximum hourly toluene usage of (1) gal/hr by the maximum VOC content of 7.2 lb VOC /gal toluene.

Emissions Unit ID: **K001**

Compliance with the daily allowable VOC emission limitation shall be based upon the record keeping requirements specified in Section C.2.j.

b. Emission Limitation

Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Particulate Emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.25); and

CE = fractional control efficiency of the control equipment (0.99).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Particulate Emissions (PE) shall not exceed 2.41 tpy.

Applicable Compliance Method

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore compliance with the hourly PE emission limitation demonstrates compliance with the annual PE emission limitation.

e. Emission Limitation

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Total combined usage of coatings, thinner, and cleanup material, for this emissions unit shall not exceed 10 gal/day.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.2.k.

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- f. Emission Limitation  
VOC emissions from this emissions unit from coatings, thinner, and cleanup material usage shall not exceed 12.1 tons per rolling 12-month period.  
  
Applicable Compliance Method  
Compliance shall be based on the record keeping requirements specified in Section C.3.j.
  
- g. Emission Limitation  
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 9.9 tons per rolling 12-month period.  
  
Applicable Compliance Method  
Compliance shall be based on the record keeping requirements specified in Section C.4.m.
  
- h. Emission Limitation  
Emissions of all HAPs from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 24.9 tons per rolling 12-month period
  
- i. Applicable Compliance Method  
Compliance shall be based on the record keeping requirements specified in Section C.4.n.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (K002) - Paint booth 1C for coating misc. metal parts. Equipped with dry filter system.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions for this unit from coatings (paint and adhesive), thinner (toluene), and cleanup material (toluene) shall not exceed a total of 12.11 pounds per hour and 72 pounds per day.</p> <p>See Section A.2.b. and Section B.I.</p> <p>Visible particulate emissions from any stack shall not exceed 0 percent opacity, as a six-minute average.</p> <p>Particulate Emissions (PE) shall not exceed 0.551 pound per hour.</p> <p>Particulate Emissions (PE) shall not exceed 2.41 tons per year.</p> <p>See Section A.2.a. and Section B.2.</p>
OAC rule 3745-21-09(U)(2)(e)(iii)	Total combined usage of coatings, thinner, and cleanup material, for this emissions unit shall not exceed 10 gal/day. See Section A.2.c below.
OAC rule 3745-35-07(B)(1) (Synthetic minor to avoid Title V and MACT)	See Section A.2.d,e,f below.
OAC rule 3745-17-07(A)	The requirements established pursuant to this rule are less stringent than the visible emission limitation included in OAC rule 3745-31-05(A)(3) .

OAC rule 3745-17-11(B)(1)	The PE limitation established pursuant to this rule is equivalent to the PE limitation established pursuant to OAC rule 3745-31-05(A)(3)
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## **2. Additional Terms and Conditions**

- 2.a** Compliance with Best Available Technology, OAC rule 3745-31-05(A)(3), shall be demonstrated by the use of a booth and dry filter system for overspray control, short and long term limits on paint, thinner, adhesive, and cleanup material usage, and compliance with emissions limitations established in Section A.1.
- 2.b** The 12.11 pounds per hour VOC limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c** OAC rule 3745-21-09(U)(2)(e)(iii) exempts the source from the requirements of OAC-3745-21-09(U)(1)(c) which would limit VOC emissions to a maximum of 3.5 lbs VOC/gal of coating .
- 2.d** VOC emissions from this emissions unit from coatings, thinner, and cleanup material usage shall not exceed 12.1 tons per rolling, 12-month period.
- 2.e** Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 9.9 tons per rolling 12-month period.
- 2.f** Emissions of all HAPs from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 24.9 tons per rolling, 12-month period
- 2.g** This emissions unit is not subject to 40 CFR Part 63, Subpart M (MACT for Surface Coating of Miscellaneous Metal Parts) because the facility is not a major source for HAPs as established by the restrictions in 2.e and 2.f above.

## **B. Operational Restrictions**

1. The permit limits for VOC and HAP emissions are based on the permittee's use of toluene only for thinner and cleanup. Use of any other material containing VOC's or

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HAP's is prohibited, without prior approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall operate the dry filtration system for control of particulate emissions in accordance with the manufacturer's recommendations whenever this emissions unit is in operation.
3. The following average material usage rates shall not be exceeded for this emissions unit:

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paint : 1 gal/hour

toluene (whether used as thinner or for cleanup): 1 gal/hour

adhesive: 1 gal/hour

4. To ensure enforceability of the 10 gallon per day combined usage limit for coatings (paint and adhesive), thinner (toluene), and cleanup material (toluene), during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly usage levels specified in the following table for this emissions unit:

<u>Month</u>	<u>Paint usage Gallons</u>	<u>toluene usage Gallons</u>	<u>Total amount of paint, toluene, and adhesive used, Gallons</u>
1	75	230	305
1-2	150	460	610
1-3	225	690	915
1-4	300	920	1220
1-5	375	1150	1525
1-6	450	1380	1830
1-7	525	1610	2135
1-8	600	1840	2440
1-9	675	2070	2745
1-10	750	2300	3050
1-11	825	2530	3355
1-12	900	2750	3650

After the first 12 calendar months of operation following the issuance of this permit, compliance with the combined, usage limits for this emissions unit shall be based upon a rolling 12-month summation of the monthly usage figures recorded in each column of the above table.

5. To ensure enforceability of the HAP emission limits during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly emissions levels specified in the following table for the combined emissions of K001, K002, K003:

<u>Total HAP Emissions (K001,K002, K003)</u>	<u>Individual HAP Emissions (K001,K002, K003)</u>
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Emissions Unit ID: K002

<u>Month</u>	<u>Combined), Tons</u>	<u>Combined), Tons</u>
1	2.1	0.9
1-2	4.2	1.7
1-3	6.3	2.6
1-4	8.4	3.4
1-5	10.5	4.3
1-6	12.6	5.1
1-7	14.7	6.0
1-8	16.8	6.8
1-9	18.9	7.7
1-10	20.9	8.5
1-11	22.9	9.4
1-12	24.9	9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the individual HAP and total HAP, combined, emission limitations for all emissions units at the facility shall be based upon a rolling 12-month summation of the monthly emission figures recorded in each column of the above table.

- To ensure enforceability of the VOC emission limit during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly emissions levels specified in the following table for this emissions unit:

<u>Month</u>	<u>VOC Emissions, Tons</u>
1	1
1-2	2
1-3	3
1-4	4
1-5	5
1-6	6
1-7	7
1-8	8
1-9	9
1-10	10
1-11	11
1-12	12.1

Emissions Unit ID: **K002**

After the first 12 calendar months of operation following the issuance of this permit, compliance with the VOC emission limitations for this emissions unit shall be based upon a rolling, 12-month summation of the monthly emission figures .

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for this emissions unit. (Note that the coating can be either paint or adhesive):
  - a. The name and identification number of each coating used.
  - b. The name and identification number of toluene cleanup material used.
  - c. The number of gallons of each coating used, without toluene thinner.
  - d. The number of gallons of each coating used, as applied, including toluene thinner.
  - e. The number of gallons of toluene cleanup material used.
  - f. The VOC content, in pounds per gallon, of each coating used, as applied, including toluene thinner.
  - g. The VOC content, in pounds per gallon, of toluene cleanup material employed.
  - h. The total VOC emissions for all coatings used, in pounds. [ the sum of (d) times (f) for each coating used].
  - i. The total VOC emissions for toluene cleanup material used, in pounds. [ the sum of (e) times (g) ].
  - j. The total VOC emissions for all coatings and toluene cleanup material used, in pounds. [ the sum of (h) and (i) ].
  - k. The total amount of paint, adhesive, and toluene from all coatings and cleanup material used, in gallons [ the sum of (d) and (e) ].
  - l. The total number of hours the emissions unit was in operation.

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- m. The average hourly usage rate of each coating and of toluene in gallons per hour, calculated by dividing the total daily volume of each coating ( unthinned paint or adhesive) used and the total daily volume of toluene used by the number of hours the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit. (Note that the coating can be either paint or adhesive):
- a. The name and identification number of each coating used.
  - b. The name and identification number of each cleanup material used.
  - c. The number of gallons of each coating used, as applied, including thinner.
  - d. The number of gallons of toluene cleanup material used.
  - e. The VOC content, in pounds per gallon, of each coating used, including thinner.
  - f. The VOC content, in pounds per gallon, of toluene cleanup material employed.
  - g. The total VOC emissions for all coatings used, in pounds [ the sum of (c) times (e) for each coating used].
  - h. The total VOC emissions for all cleanup toluene used, in pounds [ the sum of (d) times (f) for toluene cleanup material used].
  - i. The total VOC emissions for all coatings and toluene cleanup materials used, in tons [ the sum of (g) and (h) ] divided by 2000.
  - j. The rolling 12-month summation of the total VOC emissions from all coatings and toluene cleanup materials used, in tons [ the sum of (i) for the previous 12 calendar months].
  - k. The amount of paint used (unthinned), in gallons.
  - l. The amount of toluene used ( for thinner and cleanup), in gallons.
  - m. The amount of adhesive used (unthinned), in gallons.
  - n. The total amount of paint, adhesive, and toluene from all coatings and cleanup

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- material used, in gallons [ the sum of (c) and (d) ] or [the sum of (k), (l), (m) ].
- o. The rolling, 12-month summation of the total amount of paint (unthinned) used, in gallons [ the sum of (k) for the previous 12 calendar months].
  - p. The rolling, 12-month summation of the total amount of toluene used ( for thinner and cleanup) , in gallons [ the sum of (l) for the previous 12 calendar months].
  - q. The rolling, 12-month summation of the total amount of paint, adhesive, and toluene from all coatings and cleanup material used, in gallons [ the sum of (n) for the previous 12 calendar months].
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, combined as a group. (Note that the coating can be either paint or adhesive):
- a. The name and identification number of each coating used.
  - b. The name and identification number of toluene cleanup material used.
  - c. The number of gallons of each coating used.
  - d. The number of gallons of toluene cleanup material used.
  - e. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material used.
  - g. The total individual HAP emissions from all coatings used, in pounds [for each HAP, the sum of (c) times (e) for each coating used].
  - h. The total individual HAP emissions from all cleanup material used, in pounds [for each HAP, the sum of (d) times (f) for each cleanup material used] .
  - i. The total individual HAP emissions from all coatings and cleanup materials used, in tons [ the sum of (g) and (h)] divided by 2000.
  - j. The total combined HAP's content of each coating, in pounds of combined HAP's per gallon of coating, as applied.

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- k. The total combined HAP's content of each cleanup material, in pounds of combined HAP's per gallon of cleanup material, as applied [ sum of all individual HAP contents from (f).
- l. The total combined HAPs emissions from all coatings and cleanup materials used, in tons [ the sum of (j) and (k)] divided by 2000.
- m. The rolling 12-month summation of individual HAP emissions from all coatings and cleanup materials used, in tons [ the sum of (i) for the previous 12 calendar months].
- n The rolling 12-month summation of the total combined HAPs emissions from all coatings and cleanup materials used, in tons [ the sum of (l) for the previous 12 calendar months].
5. The permit to install for emissions units K001, K002, and K003 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" pollutants:

Pollutant	Maximum emission rate per spray booth	TLV, ug/m <sup>3</sup>	MAGLC (TLV/42), ug/m <sup>3</sup>	Predicted 1-hour maximum ground level concentration, ug/m <sup>3</sup> , K001, K002, K003 combined
Toluene	7.2 lb/hr 0.91 g/sec	188,412	4,486	451 ug/m <sup>3</sup>
Xylene	3.7 lb/hr 0.47 g/sec	343,000	8,167	233 ug/m <sup>3</sup>
Ethyl Benzene	1.1 lb/hr 0.14 g/sec	434,000	10,333	70 ug/m <sup>3</sup>

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6. Physical changes to or changes in the method of operation of any of the emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to any of the emissions units or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new

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pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that:
  - a. the dry filtration system was not in service while this emissions unit was in operation.
  - b. this emissions unit employed more than the applicable maximum daily combined ( paint, adhesive, thinner, and cleanup material) usage limit of 10 gallons per day.

Each of the notifications shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information for this emissions unit:
  - a. an identification of each day during which the VOC emissions for this emissions unit from the application of coatings, thinner, and cleanup material exceeded 72 pounds per day), and the actual calculated emissions for each such day.
  - b. an identification of each day during which any of the following short term maximum average material usage rates for this unit were exceeded: 1 gallon per hour paint (unthinned), 1 gallon per hour toluene (whether used as thinner or for cleanup), or 1 gallon per hour adhesive (unthinned).
  - c. An identification of all exceedances of the rolling 12-month material usage limitations for this unit and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative material usage limitations

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for this unit set forth in Section B.4. of this permit.

- d. For K001, K002, and K003 combined as a group, an identification of all exceedances of the rolling 12-month individual HAP emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative individual HAP limitations set forth in Section B.5. of this permit.
  - e. For K001, K002, and K003 combined as a group, an identification of all exceedances of the rolling 12-month total HAPs emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative total HAPs emissions limitations set forth in Section B.5. of this permit.
  - f. An identification of all exceedances of the rolling 12-month VOC emission limitations for this unit and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC emissions limitations for this unit set forth in Section B.6. of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. and Section A.2. of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
VOC emissions shall not exceed 12.11 lb/hr and 72 lb/ day.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitations shall be demonstrated by summing the maximum hourly VOC emissions rates from the coatings and the toluene. The coating VOC emissions rate may be determined by multiplying the maximum hourly paint usage of (1) gal/hr by the maximum VOC content of 4.9 lb VOC /gal paint plus the maximum hourly adhesive usage of (1) gal/hr multiplied by the maximum VOC content of 0.01 lb VOC /gal adhesive. The toluene VOC emissions rate may be determined by multiplying the maximum hourly toluene usage of (1) gal/hr by the maximum VOC content of 7.2 lb VOC /gal toluene.

Compliance with the daily allowable VOC emission limitation shall be based

upon the record keeping requirements specified in Section C.2.j.

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b. Emission Limitation

Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Particulate Emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.25); and

CE = fractional control efficiency of the control equipment (0.99).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Particulate Emissions (PE) shall not exceed 2.41 tpy.

Applicable Compliance Method

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore compliance with the hourly PE emission limitation demonstrates compliance with the annual PE emission limitation.

e. Emission Limitation

Total combined usage of coatings, thinner, and cleanup material, for this emissions unit shall not exceed 10 gal/day.

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**Issued: To be entered upon final issuance**

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.2.k.

**Issued: To be entered upon final issuance**

- f. Emission Limitation  
VOC emissions from this emissions unit from coatings, thinner, and cleanup material usage shall not exceed 12.1 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.3.j.

- g. Emission Limitation  
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 9.9 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.4.m.

- h. Emission Limitation  
Emissions of all HAPs from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 24.9 tons per rolling 12-month period

- i. Applicable Compliance Method  
Compliance shall be based on the record keeping requirements specified in Section C.4.n.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (K003) - Paint booth 2C for coating misc. metal parts. Equipped with dry filter system.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions for this unit from coatings (paint and adhesive), thinner (toluene), and cleanup material (toluene) shall not exceed a total of 12.11 pounds per hour and 72 pounds per day.</p> <p>See Section A.2.b. and Section B.I.</p> <p>Visible particulate emissions from any stack shall not exceed 0 percent opacity, as a six-minute average.</p> <p>Particulate Emissions (PE) shall not exceed 0.551 pound per hour.</p> <p>Particulate Emissions (PE) shall not exceed 2.41 tons per year.</p> <p>See Section A.2.a. and Section B.2.</p>
OAC rule 3745-21-09(U)(2)(e)(iii)	Total combined usage of coatings, thinner, and cleanup material, for this emissions unit shall not exceed 10 gal/day. See Section A.2.c below.
OAC rule 3745-35-07(B)(1) (Synthetic minor to avoid Title V and MACT)	See Section A.2.d,e,f below.
OAC rule 3745-17-07(A)	The requirements established pursuant to this rule are less stringent than the visible emission limitation included in OAC rule 3745-31-05(A)(3) .

OAC rule 3745-17-11(B)(1)	The PE limitation established pursuant to this rule is equivalent to the PE limitation established pursuant to OAC rule 3745-31-05(A)(3)
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## **2. Additional Terms and Conditions**

- 2.a** Compliance with Best Available Technology, OAC rule 3745-31-05(A)(3), shall be demonstrated by the use of a booth and dry filter system for overspray control, short and long term limits on paint, thinner, adhesive, and cleanup material usage, and compliance with emissions limitations established in Section A.1.
- 2.b** The 12.11 pounds per hour VOC limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c** OAC rule 3745-21-09(U)(2)(e)(iii) exempts the source from the requirements of OAC-3745-21-09(U)(1)(c) which would limit VOC emissions to a maximum of 3.5 lbs VOC/gal of coating .
- 2.d** VOC emissions from this emissions unit from coatings, thinner, and cleanup material usage shall not exceed 12.1 tons per rolling, 12-month period.
- 2.e** Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 9.9 tons per rolling 12-month period.
- 2.f** Emissions of all HAPs from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 24.9 tons per rolling, 12-month period
- 2.g** This emissions unit is not subject to 40 CFR Part 63, Subpart M (MACT for Surface Coating of Miscellaneous Metal Parts) because the facility is not a major source for HAPs as established by the restrictions in 2.e and 2.f above.

## **B. Operational Restrictions**

- 1.** The permit limits for VOC and HAP emissions are based on the permittee's use of toluene only for thinner and cleanup. Use of any other material containing VOC's or

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HAP's is prohibited, without prior approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall operate the dry filtration system for control of particulate emissions in accordance with the manufacturer's recommendations whenever this emissions unit is in operation.
3. The following average material usage rates shall not be exceeded for this emissions unit:

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paint : 1 gal/hour

toluene (whether used as thinner or for cleanup): 1 gal/hour

adhesive: 1 gal/hour

4. To ensure enforceability of the 10 gallon per day combined usage limit for coatings (paint and adhesive), thinner (toluene), and cleanup material (toluene), during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly usage levels specified in the following table for this emissions unit:

<u>Month</u>	<u>Paint usage Gallons</u>	<u>toluene usage Gallons</u>	<u>Total amount of paint, toluene, and adhesive used, Gallons</u>
1	75	230	305
1-2	150	460	610
1-3	225	690	915
1-4	300	920	1220
1-5	375	1150	1525
1-6	450	1380	1830
1-7	525	1610	2135
1-8	600	1840	2440
1-9	675	2070	2745
1-10	750	2300	3050
1-11	825	2530	3355
1-12	900	2750	3650

After the first 12 calendar months of operation following the issuance of this permit, compliance with the combined, usage limits for this emissions unit shall be based upon a rolling 12-month summation of the monthly usage figures recorded in each column of the above table.

5. To ensure enforceability of the HAP emission limits during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly emissions levels specified in the following table for the combined emissions of K001, K002, K003:

<u>Total HAP Emissions (K001,K002, K003)</u>	<u>Individual HAP Emissions (K001,K002, K003)</u>
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Emissions Unit ID: **K003**

<u>Month</u>	<u>Combined), Tons</u>	<u>Combined), Tons</u>
1	2.1	0.9
1-2	4.2	1.7
1-3	6.3	2.6
1-4	8.4	3.4
1-5	10.5	4.3
1-6	12.6	5.1
1-7	14.7	6.0
1-8	16.8	6.8
1-9	18.9	7.7
1-10	20.9	8.5
1-11	22.9	9.4
1-12	24.9	9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the individual HAP and total HAP, combined, emission limitations for all emissions units at the facility shall be based upon a rolling 12-month summation of the monthly emission figures recorded in each column of the above table.

- To ensure enforceability of the VOC emission limit during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative monthly emissions levels specified in the following table for this emissions unit:

<u>Month</u>	<u>VOC Emissions,</u> <u>Tons</u>
1	1
1-2	2
1-3	3
1-4	4
1-5	5
1-6	6
1-7	7
1-8	8
1-9	9
1-10	10
1-11	11
1-12	12.1

Emissions Unit ID: **K003**

After the first 12 calendar months of operation following the issuance of this permit, compliance with the VOC emission limitations for this emissions unit shall be based upon a rolling, 12-month summation of the monthly emission figures .

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for this emissions unit. (Note that the coating can be either paint or adhesive):
  - a. The name and identification number of each coating used.
  - b. The name and identification number of toluene cleanup material used.
  - c. The number of gallons of each coating used, without toluene thinner.
  - d. The number of gallons of each coating used, as applied, including toluene thinner.
  - e. The number of gallons of toluene cleanup material used.
  - f. The VOC content, in pounds per gallon, of each coating used, as applied, including toluene thinner.
  - g. The VOC content, in pounds per gallon, of toluene cleanup material employed.
  - h. The total VOC emissions for all coatings used, in pounds. [ the sum of (d) times (f) for each coating used].
  - i. The total VOC emissions for toluene cleanup material used, in pounds. [ the sum of (e) times (g) ].
  - j. The total VOC emissions for all coatings and toluene cleanup material used, in pounds. [ the sum of (h) and (i) ].
  - k. The total amount of paint, adhesive, and toluene from all coatings and cleanup material used, in gallons [ the sum of (d) and (e) ].
  - l. The total number of hours the emissions unit was in operation.

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- m. The average hourly usage rate of each coating and of toluene in gallons per hour, calculated by dividing the total daily volume of each coating ( unthinned paint or adhesive) used and the total daily volume of toluene used by the number of hours the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit. (Note that the coating can be either paint or adhesive):
    - a. The name and identification number of each coating used.
    - b. The name and identification number of each cleanup material used.
    - c. The number of gallons of each coating used, as applied, including thinner.
    - d. The number of gallons of toluene cleanup material used.
    - e. The VOC content, in pounds per gallon, of each coating used, including thinner.
    - f. The VOC content, in pounds per gallon, of toluene cleanup material employed.
    - g. The total VOC emissions for all coatings used, in pounds [ the sum of (c) times (e) for each coating used].
    - h. The total VOC emissions for all cleanup toluene used, in pounds [ the sum of (d) times (f) for toluene cleanup material used].
    - i. The total VOC emissions for all coatings and toluene cleanup materials used, in tons [ the sum of (g) and (h) ] divided by 2000.
    - j. The rolling 12-month summation of the total VOC emissions from all coatings and toluene cleanup materials used, in tons [ the sum of (i) for the previous 12 calendar months].
    - k. The amount of paint used (unthinned), in gallons.
    - l. The amount of toluene used ( for thinner and cleanup), in gallons.
    - m. The amount of adhesive used (unthinned), in gallons.
    - n. The total amount of paint, adhesive, and toluene from all coatings and cleanup

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- material used, in gallons [ the sum of (c) and (d) ] or [the sum of (k), (l), (m) ].
- o. The rolling, 12-month summation of the total amount of paint (unthinned) used, in gallons [ the sum of (k) for the previous 12 calendar months].
  - p. The rolling, 12-month summation of the total amount of toluene used ( for thinner and cleanup) , in gallons [ the sum of (l) for the previous 12 calendar months].
  - q. The rolling, 12-month summation of the total amount of paint, adhesive, and toluene from all coatings and cleanup material used, in gallons [ the sum of (n) for the previous 12 calendar months].
4. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, combined as a group. (Note that the coating can be either paint or adhesive):
- a. The name and identification number of each coating used.
  - b. The name and identification number of toluene cleanup material used.
  - c. The number of gallons of each coating used.
  - d. The number of gallons of toluene cleanup material used.
  - e. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material used.
  - g. The total individual HAP emissions from all coatings used, in pounds [for each HAP, the sum of (c) times (e) for each coating used].
  - h. The total individual HAP emissions from all cleanup material used, in pounds [for each HAP, the sum of (d) times (f) for each cleanup material used] .
  - i. The total individual HAP emissions from all coatings and cleanup materials used, in tons [ the sum of (g) and (h)] divided by 2000.
  - j. The total combined HAP's content of each coating, in pounds of combined HAP's per gallon of coating, as applied.

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- k. The total combined HAP's content of each cleanup material, in pounds of combined HAP's per gallon of cleanup material, as applied [ sum of all individual HAP contents from (f).
- l. The total combined HAPs emissions from all coatings and cleanup materials used, in tons [ the sum of (j) and (k)] divided by 2000.
- m. The rolling 12-month summation of individual HAP emissions from all coatings and cleanup materials used, in tons [ the sum of (i) for the previous 12 calendar months].
- n The rolling 12-month summation of the total combined HAPs emissions from all coatings and cleanup materials used, in tons [ the sum of (l) for the previous 12 calendar months].
5. The permit to install for emissions units K001, K002, and K003 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" pollutants:

Pollutant	Maximum emission rate per spray booth	TLV, ug/m <sup>3</sup>	MAGLC (TLV/42), ug/m <sup>3</sup>	Predicted 1-hour maximum ground level concentration, ug/m <sup>3</sup> , K001, K002, K003 combined
Toluene	7.2 lb/hr 0.91 g/sec	188,412	4,486	451 ug/m <sup>3</sup>
Xylene	3.7 lb/hr 0.47 g/sec	343,000	8,167	233 ug/m <sup>3</sup>
Ethyl Benzene	1.1 lb/hr 0.14 g/sec	434,000	10,333	70 ug/m <sup>3</sup>

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6. Physical changes to or changes in the method of operation of any of the emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to any of the emissions units or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new

Emissions Unit ID: **K003**

pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that:
  - a. the dry filtration system was not in service while this emissions unit was in operation.
  - b. this emissions unit employed more than the applicable maximum daily combined ( paint, adhesive, thinner, and cleanup material) usage limit of 10 gallons per day.

Each of the notifications shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information for this emissions unit:
  - a. an identification of each day during which the VOC emissions for this emissions unit from the application of coatings, thinner, and cleanup material exceeded 72 pounds per day), and the actual calculated emissions for each such day.
  - b. an identification of each day during which any of the following short term maximum average material usage rates for this unit were exceeded: 1 gallon per hour paint (unthinned), 1 gallon per hour toluene (whether used as thinner or for cleanup), or 1 gallon per hour adhesive (unthinned).
  - c. An identification of all exceedances of the rolling 12-month material usage limitations for this unit and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative material usage limitations

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for this unit set forth in Section B.4. of this permit.

- d. For K001, K002, and K003 combined as a group, an identification of all exceedances of the rolling 12-month individual HAP emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative individual HAP limitations set forth in Section B.5. of this permit.
  - e. For K001, K002, and K003 combined as a group, an identification of all exceedances of the rolling 12-month total HAPs emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative total HAPs emissions limitations set forth in Section B.5. of this permit.
  - f. An identification of all exceedances of the rolling 12-month VOC emission limitations for this unit and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC emissions limitations for this unit set forth in Section B.6. of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. and Section A.2. of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
VOC emissions shall not exceed 12.11 lb/hr and 72 lb/ day.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitations shall be demonstrated by summing the maximum hourly VOC emissions rates from the coatings and the toluene. The coating VOC emissions rate may be determined by multiplying the maximum hourly paint usage of (1) gal/hr by the maximum VOC content of 4.9 lb VOC /gal paint plus the maximum hourly adhesive usage of (1) gal/hr multiplied by the maximum VOC content of 0.01 lb VOC /gal adhesive. The toluene VOC emissions rate may be determined by multiplying the maximum hourly toluene usage of (1) gal/hr by the maximum VOC content of 7.2 lb VOC /gal toluene.

Compliance with the daily allowable VOC emission limitation shall be based

upon the record keeping requirements specified in Section C.2.j.

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b. Emission Limitation

Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Particulate Emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.25); and

CE = fractional control efficiency of the control equipment (0.99).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Particulate Emissions (PE) shall not exceed 2.41 tpy.

Applicable Compliance Method

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore compliance with the hourly PE emission limitation demonstrates compliance with the annual PE emission limitation.

e. Emission Limitation

Total combined usage of coatings, thinner, and cleanup material, for this emissions unit shall not exceed 10 gal/day.

Emissions Unit ID: **K003**

**Issued: To be entered upon final issuance**

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.2.k.

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- f. Emission Limitation  
VOC emissions from this emissions unit from coatings, thinner, and cleanup material usage shall not exceed 12.1 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.3.j.

- g. Emission Limitation  
Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 9.9 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements specified in Section C.4.m.

- h. Emission Limitation  
Emissions of all HAPs from all materials employed by emissions units K001, K002 and K003 combined (group limit) shall not exceed 24.9 tons per rolling 12-month period

- i. Applicable Compliance Method  
Compliance shall be based on the record keeping requirements specified in Section C.4.n.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (N001) - Burn-off oven, rated at 2.35 mmBtu/hr firing natural gas to clean parts prior to coating. Equipped with afterburner.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate Emissions (PE) shall not exceed 0.016 pound per hour. Particulate Emissions (PE) shall not exceed 0.07 ton PE per year.  Visible particulate emissions from any stack shall not exceed 5 percent opacity except for 6 minutes in any 60 minute period during which the opacity shall not exceed 10%.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(B).
OAC rule 3745-17-07(A)(1)	The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-09(B)	PE shall not exceed 0.20 lb of PE/100 lbs of liquid, semi-solid, or solid refuse and salvageable material charged.
OAC rule 3745-17-09(C)	See Section B.1.

**2. Additional Terms and Conditions**

- 2.a BAT for this emissions unit has been determined to be the use of natural gas as fuel and use of an afterburner. BAT requirements also include compliance with the terms and conditions of this permit.

**B. Operational Restrictions**

1. The emissions unit, including all associated equipment and grounds, shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.

Emissions Unit ID: **N001**

2. The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the burn-off oven, or physically modify the burn-off oven in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.
3. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
  - a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures.
  - b. the secondary chamber shall allow for a minimum retention time of one half second at 1400 degrees Fahrenheit, taking into account normal start-up procedures.
4. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this burn-off oven and shall comply with the following operational restrictions:
  - a. the permittee shall ensure that the burn-off oven is operated only by properly trained personnel who have read, and understand, the burn-off ovens operation manual;
  - b. prior to start-up of the burn-off oven, the permittee shall remove ash residue left inside the burn-off oven after the previous cycle;
  - c. the permittee shall not operate the burn-off oven if the built-in safeguards and interlocks (burn-off oven excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
  - d. the permittee shall not process uncured paint or paint sludge, paint filter, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC, lead, plastisols, rubber-coated material, oil, wood, grease, trash, magnesium, oil filters, ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR Part 261, Subpart D in this burn-off oven. Paint hooks covered with coatings that may contain chlorine (e.g. PVC), fluorine (e.g. Teflon), or elements other than carbon, hydrogen, and oxygen are also prohibited from being processed in this burn-off oven.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
2. The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:
  - a. the dates the emissions unit was operated;
  - b. the number of batches processed for each date the emissions unit was operated; and
  - c. the dates and descriptions of any additional maintenance activities performed on this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:
  - a. the date of the excursion;
  - b. the temperature values during the excursion;
  - c. the cause(s) for the excursion; and
  - d. the corrective action which has been or will be taken to prevent similar excursions in the future.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A. of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **N001**

- a. Emission Limitation:  
PE shall not exceed 0.016 pound per hour.

Applicable Compliance Method:

The lb/hr emission limitation was developed by multiplying the emission limitation of 0.20 lb PE/100 lbs of liquid, semi-solid, or solid refuse and salvageable material charged by a maximum average charging rate of 8 lbs/hr. If required, compliance shall be determined in accordance with the test methods and procedures in Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:  
PE shall not exceed 0.07 ton per year.

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

The annual limit was developed by multiplying the hourly PE emission limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limit will also be assumed.

c. Emission Limitation

VE from any stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through VE observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation

PE shall not exceed 0.20 lb of PE/100 lbs of refuse and salvageable material charged.

Applicable Compliance Method

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(8).

**F. Miscellaneous Requirements**

None