Facility ID: 1409000654 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

**Facility ID: 1409000654 Emissions Unit ID: R006 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Dip coating tank for metal and non-metal parts - Dip Tank #6 | OAC 3745-31-05<br>PTI 14-4300 | See A.2.a - e. |
| | OAC 3745-21-07(G)(2) | Less stringent than PTI. |
| | OAC 3745-21-09(U)(1) | Exempt per OAC 3745-21-09(U)(2)(f)(ii). |

2. **Additional Terms and Conditions**

   (a) The organic compounds (OC) emissions shall not exceed 3.85 pounds per hour when coating metal or non-metal parts. (This limit is based on maximum design capacity of the equipment; therefore, no record keeping, reporting, or testing is required to demonstrate compliance with this limit.)
   The OC emissions shall not exceed 40 pounds per day when coating non-metal parts.
   The total OC emissions from metal and non-metal coatings, including cleanup, from emissions units R001 thru R008 shall not exceed 18.33 TPY, based upon a rolling, 12-month summation.

   To ensure federal enforceability during the first 12 calender months of operation following the issuance of permit to install (PTI) 14-4300 (issued on October 22, 1997), the permittee shall not exceed the emission limits specified in the following table:

   Month Maximum Allowable Cumulative OC Emissions
   - from emissions units R001 thru R008
   - (Tons)

   1-1 9.17
   1-2 9.17
   1-3 9.17
   1-4 9.17
   1-5 9.17
   1-6 9.17
   1-7 10.69
   1-8 12.22
   1-9 13.75
   1-10 15.28
   1-11 16.80
   1-12 18.33

   After the first 12 calendar months of operation following the issuance of PTI 14-4300, compliance with the annual emission limitation for OC shall be based on a rolling, 12-month summation of the OC emissions.
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based on a rolling, twelve-month total.
   The OC content of any coating used in this emissions unit shall not exceed 7.7 pounds per gallon, as applied. The OC content of any cleanup material shall not exceed 12.2 pounds per gallon.

B. **Operational Restrictions**

None

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

1. The permittee shall collect and record the following information each month for the entire facility:

   a. The name and identification number of each coating used.
   b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
   c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (the sum of all the individual HAP contents from (b)).
   d. The number of gallons of each coating employed.
   e. The name and identification of each organic cleanup material employed.
   f. The individual HAP content for each HAP of each organic cleanup material, in pounds of individual HAP per gallon of organic cleanup material, as applied.
   g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied (the sum of all the individual HAP contents from (f)).
   h. The number of gallons of each organic cleanup material employed.
   i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each organic cleanup material).
   j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material).
   k. The rolling, twelve-month total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons.
   l. The rolling, twelve-month total combined HAP emissions for all HAPs from all coatings and cleanup materials employed, in pounds or tons.
   A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

2. On any day, during which a non-metal part is coated in this emissions unit, the permittee shall maintain the following daily records:

   a. The company identification for each coating and organic cleanup material employed for non-metal parts (as applied).
   b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material as defined in Ohio Administrative Code (OAC) 3745-21-01(C)(5).
   c. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
   d. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
   e. The total OC emissions (the sum of (c) times (d) for all coatings and organic cleanup materials from coating non-metal parts), in pounds per day.

3. The permittee shall maintain monthly records of the following for emissions units R001 thru R008:

   a. The company identification for each coating and organic cleanup material employed.
   b. The number of gallons, as applied, of each coating and organic cleanup material employed for coating both metal and non-metal parts.
   c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied.
   d. The monthly OC emissions (the sum of (b) times (c) for all coatings and organic cleanup materials employed), in pounds or tons.
   e. For the first twelve calender months after issuance of the PTI, the cumulative monthly OC emissions (sum of (d) for all calender months after the issuance of the PTI, including the current calender month).
   f. After the first twelve calender months from the issuance of the PTI, the updated rolling, twelve-month total OC emissions (sum of (d) for the current month and the preceding eleven-months).

D. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or the local air agency) of any exceedance of the HAP emissions limitations. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

2. The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a non-metal part was coated in this emissions unit and the OC emissions from the coatings and organic cleanup material used for non-metal parts exceeded 40 pounds per day; along with the record indicating the actual OC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the rolling, 12-month OC emission limitation and, for the first 12 calendar months of operation following the issuance of PTI 14-4300, any exceedance of the maximum allowable cumulative OC emission limits.

4. The permittee shall submit annual reports which specify the total OC emissions from emissions units R001-R008 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the OC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the daily OC emissions limit in A.2.b shall be determined by the record keeping in C.2.e.

3. Compliance with the annual OC emissions limit in A.2.c shall be determined by the record keeping in C.3.e and C.3.f.

4. Compliance with the HAP emission limits in A.2.d shall be determined by the record keeping in C.1.

5. Compliance with the OC content limits in A.2.e shall be determined by the record keeping in C.3.c.

F. **Miscellaneous Requirements**

1. The following terms in this permit are federally enforceable:

   Terms A.2.c, A.2.d, C.1, C.3, D.1 and D.3.