

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.

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

Facility ID: 1409000654 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #1	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05. exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit. The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit. The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

1. 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.

2. 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 [sum 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 HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum 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 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 HAPs emissions from all coatings and organic cleanup materials employed, in pounds 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 updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - l. The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
 3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
 - a. The company identification for each coating and organic cleanup material employed for non-metal parts.
 - b. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - d. The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
 4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- D. Reporting Requirements**
1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
 2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual

OC emissions for each such day.

b. Any exceedance of the OC content limitation for any coating or cleanup material.

3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.

b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.

c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.

d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.

2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 3.12
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4018
MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. Changes in the composition of the materials used, or use of new materials, that would result in the emission

of an air contaminant not previously permitted; and

d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1409000654 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #2	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-09(U)(1)	exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit. The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit. The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

- 1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

1. 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.
2. 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 [sum 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 HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum 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 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 HAPs emissions from all coatings and organic cleanup materials employed, in pounds 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 updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - l. The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
 - a. The company identification for each coating and organic cleanup material employed for non-metal parts.
 - b. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - d. The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions

that were taken to achieve compliance.

2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 3.12
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4018
MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as

indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1409000654 Emissions Unit ID: R003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #3	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05. exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit. The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit. The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the

number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

1. 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.
2. 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 [sum 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 HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum 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 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 HAPs emissions from all coatings and organic cleanup materials employed, in pounds 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 updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - l. The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
 - a. The company identification for each coating and organic cleanup material employed for non-metal parts.
 - b. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - d. The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 3.12
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4018
MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1409000654 Emissions Unit ID: R004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #4	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05. exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly

record keeping, reporting or testing is required to demonstrate compliance with this limit.

The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit.

The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

1. 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.
2. 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 [sum 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 HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum 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 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 HAPs emissions from all coatings and organic cleanup materials employed, in pounds 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 updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - l. The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
 - a. The company identification for each coating and organic cleanup material employed for non-metal parts.
 - b. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - d. The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month

and the preceding eleven calendar months].

5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 3.12
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 4018
 MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1409000654 Emissions Unit ID: R005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #5	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-09(U)(1)	exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

- 2. **Additional Terms and Conditions**

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit.

The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit.

The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

1. 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.
2. The permittee shall collect and record the following information each month for the entire facility:
- The name and identification number of each coating used.
 - The individual hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - The number of gallons of each coating employed.
 - The name and identification of each organic cleanup material employed.
 - 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.
 - The total combined HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - The number of gallons of each organic cleanup material employed.
 - The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds 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].
 - The total combined HAPs emissions from all coatings and organic cleanup materials employed, in pounds per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
 - The updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
- The company identification for each coating and organic cleanup material employed for non-metal parts.
 - The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
- The company identification for each coating and organic cleanup material employed.
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- D. Reporting Requirements**
1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
 2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
 3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.
- E. Testing Requirements**
1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.
 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
- F. Miscellaneous Requirements**
1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
 2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the

emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 3.12
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4018
 MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #6	OAC rule 3745-31-05 (PTI 14-4664)	See A.2.

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

The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05.

OAC rule 3745-21-09(U)(1)

exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. **Additional Terms and Conditions**

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit.

The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit.

The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. **Operational Restrictions**

1. The OC content of any coating used in emissions units R001 through R009 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.

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

1. 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.
2. The permittee shall collect and record the following information each month for the entire facility:
- The name and identification number of each coating used.
 - The individual hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - The number of gallons of each coating employed.
 - The name and identification of each organic cleanup material employed.
 - 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.
 - The total combined HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - The number of gallons of each organic cleanup material employed.
 - The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds 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].
 - The total combined HAPs emissions from all coatings and organic cleanup materials employed, in pounds per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
 - The updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
- The company identification for each coating and organic cleanup material employed for non-metal parts.
 - The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].

4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- D. Reporting Requirements**
1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
 2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
 3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.
- E. Testing Requirements**
1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.
 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
- F. Miscellaneous Requirements**
1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The

Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.

2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 3.12
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4018
 MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1409000654 Emissions Unit ID: R007 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #7	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05. exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit. The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit. The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

- 1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

- 1. 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.
- 2. 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 [sum 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 HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum 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 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 HAPs emissions from all coatings and organic cleanup materials employed, in pounds 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 updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - l. The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
- 3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
 - a. The company identification for each coating and organic cleanup material employed for non-metal parts.
 - b. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.

- c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - d. The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
- 4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
 - 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
- 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- D. Reporting Requirements**
 - 1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
 - 2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
 - 3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.
- E. Testing Requirements**
 - 1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC
 - Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.
 - Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs
 - Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC
 - Applicable Compliance Method:
The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 3.12
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 4018
 MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1409000654 Emissions Unit ID: R008 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #8	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05. exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit.

The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit.

The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

1. 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.
2. The permittee shall collect and record the following information each month for the entire facility:
- The name and identification number of each coating used.
 - The individual hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - The number of gallons of each coating employed.
 - The name and identification of each organic cleanup material employed.
 - 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.
 - The total combined HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - The number of gallons of each organic cleanup material employed.
 - The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds 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].
 - The total combined HAPs emissions from all coatings and organic cleanup materials employed, in pounds per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
 - The updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
 - The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a

photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:

- a. The company identification for each coating and organic cleanup material employed for non-metal parts.
 - b. The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - c. The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - d. The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
- 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 input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - e. The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
2. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - a. An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Any exceedance of the OC content limitation for any coating or cleanup material.
3. The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
40 lbs/day of OC

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - b. OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.

Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - c. Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:
Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.
 - d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:

The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 3.12
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 4018
 MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1409000654 Emissions Unit ID: R009 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

- (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dip coating tank for metal and non-metal parts - Dip Tank #9	OAC rule 3745-31-05 (PTI 14-4664) OAC rule 3745-21-07(G)(2)	See A.2. The emission limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-09(U)(1)	exempt, pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. Additional Terms and Conditions

- (a) 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. Compliance with the above limitations shall be based on a rolling, 12-month summation. The organic compound (OC) emissions from emissions units R001 through R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts.

The hourly OC emissions limit is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit. The OC emissions from emissions units R001 through R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit. The permittee shall not employ coating material containing more than 18.33 tons of OC per rolling, 12-month period, based upon the monthly OC input rate to emissions units R001 through R009 combined.

Monthly OC input rate = [sum of A x B for each coating and cleanup material employed]; where A = the number of gallons of each coating or cleanup material employed per month and B = OC content of the coating or cleanup material, in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100% of the solvent in the coatings and cleanup materials being emitted.

B. Operational Restrictions

- 1. The OC content of any coating used in emissions units R001 through R009 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.

C. Monitoring and/or Record Keeping Requirements

- 1. 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.
- 2. 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 [sum 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 HAPs content of each organic cleanup material, in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum 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 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 HAPs emissions from all coatings and organic cleanup materials employed, in pounds 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 updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons.
- l. The updated rolling, 12-month summation of the total combined HAPs from all coatings and cleanup materials employed, in tons.
3. On any day during which a non-metal part is coated with any liquid organic material whose volatile content is a photochemically reactive material in any of the emissions units R001 through R009, the permittee shall maintain the following daily records for each such emissions unit:
- The company identification for each coating and organic cleanup material employed for non-metal parts.
 - The number of gallons of each coating and organic cleanup material employed for coating non-metal parts.
 - The OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts.
 - The total OC emission rate for all coatings and organic cleanup materials used for coating non-metal parts, in pounds per day [summation of (b x c) for each coating and organic cleanup material].
4. The permittee shall maintain monthly records for emissions units R001 through R009 combined that contain the following information:
- The company identification for each coating and organic cleanup material employed.
 - The number of gallons, as applied, of each coating and organic cleanup material employed for coating both metal and non-metal parts.
 - The OC content of each coating and organic cleanup material, in pounds per gallon, as applied.
 - The monthly OC input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed and divided by 2000 lbs/ton], in tons.
 - The updated rolling, 12-month summation of the OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- D. Reporting Requirements**
- The permittee shall submit deviation reports that identify any monthly record showing an exceedance of the HAP emission limitations set forth in Term and Condition A.2. The permittee shall also identify the corrective actions that were taken to achieve compliance.
 - The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 through R009:
 - An identification of each day during which a non-metal part was coated using any liquid organic material and the OC emissions from the coatings and organic cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - Any exceedance of the OC content limitation for any coating or cleanup material.
 - The permittee shall submit deviation reports that identify all exceedances of the OC input rate (emissions) limitation, as a rolling, 12-month summation, for emissions units R001 through R009 combined.
- E. Testing Requirements**
- Compliance with the emission limitations in Sections A.1 and A.2, the material usage restrictions in Section A.2., and the material content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:
 - Emission Limitation:
40 lbs/day of OC
 - Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping performed in accordance with Section C.3 of these terms and conditions.
 - OC Contents and Usage Restrictions:
Coatings: 7.7 lbs/gal, as applied, of OC
Cleanup: 12.2 lbs/gal of OC
Coatings and Cleanup: Usage shall not result in the employment of more than 18.33 tons of OC per rolling, 12-month summation based upon the monthly OC input rate for emissions units R001 through R009 combined.
 - Applicable Compliance Method:
Compliance with the OC content limitations and usage limitation shall be based upon the record keeping performed in accordance with Sections C.3 and C.4 of these terms and conditions.
 - Emission Limitations:
less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2 of these terms and conditions.

d. Emission Limitation:
3.85 lbs/hr of OC

Applicable Compliance Method:

The permittee shall determine compliance with the hourly OC emission limitation by multiplying the maximum hourly OC usage rate (gallons/hr) by the maximum OC content (lbs/gallon) of all the coatings.

If required, the permittee shall demonstrate compliance with the above limitation based upon the procedures found in 40 CFR, Part 60, Appendix A, Methods 25 or 25 A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following miscellaneous requirements are as stringent as or more stringent than the Additional Special Terms and Conditions A through F contained in Permit to Install # 14-4300 issued on October 22, 1997: F.2. The Additional Special Terms and Conditions contained in the above-referenced Permit to Install are subsumed into the miscellaneous requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying Additional Special Terms and Conditions in the Permit to Install.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 3.12
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4018
MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.