Facility ID: 1409030916 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 1409030916 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Semi-Downdraft Paint Spray and Baking Booth	OAC rule 3745-31-05(A)(3) (PTI 14-05594)	8 lbs OC/hr, 40 lbs OC/day, including cleanup materials 7.2 TPY OC, including cleanup materials See terms B.1. and B.2.
	OAC rule 3745-21-07(G)(2)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, OC content limitations, and coating and cleanup material usage limits.

B. **Operational Restrictions**

1. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R004:

   clearcoat 1000 gals/year
   basecoat 500 gals/year
   primer 1000 gals/year
   cleanup material 1.0 gal/day; 330 gals/year

2. The OC content of the materials employed in emissions unit R004 shall not exceed the following limits:
   clearcoat 4.3 lbs OC/gal
   basecoat 6.2 lbs OC/gal
   primer 4.5 lbs OC/gal
   cleanup material 7.05 lbs OC/gal

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

1. The permittee shall collect and record the following information for each day for the coating operation:

   a. The company identification for each coating and cleanup material employed, by type of coating and cleanup material.

   b. The number of gallons of each coating and cleanup material employed, by type of coating and cleanup material.

   c. The organic compound content of each coating and cleanup material, in pounds per gallon, by type of coating and cleanup material.

   d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day, by type of coating and cleanup material (b x c).

   e. The total combined organic compound emission rate for all coatings and cleanup materials, in pounds per day.

   f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e.)/(f.), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain monthly records of the OC emissions from the coatings and cleanup materials for this emissions unit. The OC emissions shall be summarized in tons per year at the end of each calendar year.

3. The permit to install for this emissions unit (R004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-butanol

TLV (ug/m3): 60,630

Maximum Hourly Emission Rate (lbs/hr): 0.41

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 309

MAGLC (ug/m3): 1444
Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information for this emissions unit:

a. An identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permitee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in term B.1.

3. The permittee shall submit deviation reports which identify all exceedances of the OC content limits in term B.2.

4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit R004 for the previous calendar year. This report shall list the emissions from the coatings and cleanup materials separately. These reports shall be submitted by January 31 of each year.

5. Unless specified, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the usage limitations in term B.1 shall be demonstrated by the record keeping requirements specified in term C.1.

2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

   Emission Limitation(s):
   8 lbs OC/hour
   40 lbs OC/day
   7.2 TPY

   Applicable Compliance Method:
   Compliance with the OC emission limitation in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.1 and C.2.

3. Compliance with the OC content limitation in term B.2. shall be demonstrated by the record keeping requirements specified in term C.1.

4. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

F. **Miscellaneous Requirements**

1. None