Facility ID: 1431053946 Issuance type: Final State Permit To Operate

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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: 1431053946 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Paint spray booth No. 1 with dry filter	OAC 3745-31-05 See F.	1457 lbs OC/day and 41.8 TPY OC from R001-R006. See A.2.
	OAC 3745-17-11(A) See F.	0.551 lb PM-PM10 /hour and 2.4 TPY PM-PM10
	OAC 3745-17-07(A) See F.	See A.2.a.
	OAC 3745-21-07(G) See F.	See A.2.b.

2. **Additional Terms and Conditions**

   (a) Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a six-minute average, except as specified by rule.
   The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited in emissions units R001 through R006.
   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.
   The OC content of all coatings and cleanup materials (as applied) shall not exceed the following limits:

   ---------- Pounds OC/Gallon
   Enamel 3.6
   Varnish (Topcoat) 4.3
   Glaze 4.4
   Toner 6.3
   Cleanup (Thinner) 6.9

B. **Operational Restrictions**

1. The usage of all coatings and cleanup materials employed in paint spray booths R001-R006 shall not exceed the following limitations:

   ---------- Gal./Day Gal./Month Gal./Year
   Enamel 67.2 433.3 5200
   Varnish (Topcoat) 86.4 371.7 4460
   Glaze 43.2 188.8 2265
   Toner 90.0 375.0 4500
   Cleanup (Thinner) 11.9 85.9 1031

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

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

   a. the name and identification number of each coating, as applied;
   b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
   c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (the sum of all the individual HAP contents from (b));

d. the number of gallons of each coating employed;
e. the name and identification of each cleanup material employed;
f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f));
h. the number of gallons of each cleanup material employed.
i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material); and
j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

2. The permittee shall maintain daily records of the following for R001-R006:

a. The name and identification for each coating and cleanup material employed.

b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.

c. The number of gallons of each coating and cleanup material employed.

d. The OC content of each coating and cleanup material, in pounds per gallon.

e. The total OC emissions from R001-R006 (the sum of c. x d. for all coatings and cleanup materials employed), in pounds.

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

3. The permittee shall maintain monthly records of the following for R001-R006:

a. The company identification for each coating and cleanup material employed.

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

D. **Reporting Requirements**

1. Prior to changing any of the materials employed, the permittee shall provide written notification to the Ohio EPA field office.

Such notification shall include information, in an acceptable form, sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and /or control requirements as outlined in this permit. This notification at a minimum, will include the company identification of the new material to be employed, the solvent and toxic air pollutant constituent composition of the material, and the maximum amount used in pounds per hour.

2. The permittee shall submit deviation (excursion) reports which identify:

a. each day during which the total organic compound emission rate exceeded 1457 pounds per day, and the actual organic compound emission rate for each such day;

b. any exceedance of the daily, monthly, and/or annual coating and cleanup material usage limits in B.1. and the actual material usage rate for each such day, month and/or year; and

c. any exceedance of the OC content limits in A.2.d., and the actual OC content for each such exceedance.

The deviation reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively). If no exceedances occurred during the reporting period, then a report is required stating so.

3. The permittee shall submit annual reports which the summarize the following for R001-R006:

a. the total VOC emissions;

b. the total coating and cleanup material usages;

c. the individual HAP emissions; and

d. the combined HAP emissions.

These reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. Compliance with the visible emission limitation in OAC 3745-17-07(A) shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(1).

2. USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the inks and coatings.

3. Compliance with the particulate emission limit of 0.551 lbs PM-PM10/hour and 2.4 TPY PM-PM10 shall be demonstrated by the following calculations:

Lbs/Hr.= Weight of gallon of coating x weight fraction of solids x gallons of coatings per hour x TE(transfer eff.)

X CE(control eff.)

TPY = Weight of gallon of coating x weight fraction of solids x gallons of coatings per year x TE(transfer eff.) X CE(control eff.) X 1/2000.

4. Compliance with the VOC content limits, the daily VOC emission limit and the daily usage limits shall be demontrated by the record keeping requirements in C.2. and C.3.

5. Compliance with annual VOC emissions shall be based on the sum of all coatings, as applied, for all paint spray booths plus all cleanup materials, and calculated as follows:

   Coating VOC, as applied, pounds/gallon * gallons/year *1/2000 = TPY VOC
   Cleanup VOC, as applied, pounds/gallon * gallons/year *1/2000 = TPY VOC
   Total VOC Emissions = TPY VOC coatings + TPY VOC cleanup

6. Compliance with the HAP emission limits shall be demontrated by the record keeping requirements in C.1.

F. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install PTI 14-4297 as issued on June 11, 1997: A-E.