

Facility ID: 0123010202 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - Warehouse NW make up air unit;
B002 - Over Production Office make up air unit;
B003 - Near Maintenance make up air unit;
B004 - East Outside make up air unit;
B005 - North Outside make up air unit;
B006 - E/102 Mid Plant Dry Off Oven;
B007 - Ducted to NPL and West End of Manufacturing Water Washer;
B008 - Part of Old Paint Line Dry Off Oven;
B009 - Part of Old Paint Line Water Washer;
B010 - New Paint Line Power Wash Stage 2, Burner 1;
B011 - New Paint Line Power Wash Stage 2, Burner 2;
B012 - New Paint Line Power Wash Stage 3;
B013 - New Paint Line Ceiling, Booths make up air unit;
B014 - New Paint Line Ceiling, Building make up air unit;
B015 - New Paint Line, Floor Air Rotation Unit;
B016 - Over Employee Relations make up air unit;
B017 - Manufacturing Building NE make up air unit;
K001 - Spot Paint Booth;
N001 - Controlled Pyrolysis Furnace;
P007 - Compression and Molding Press # 15;
P008 - Compression and Molding Press # 40;
P009 - Compression and Molding Press # 101;
P010 - Compression and Molding Press # 102;
P011 - Compression and Molding Press # 103;
P012 - Compression and Molding Press # 150;
P013 - Compression and Molding Press # 151;
P014 - Compression and Molding Press # 152;
P015 - Compression and Molding Press # 81;
P016 - Compression and Molding Press # 82;
P017 - Compression and Molding Press # 83;
P018 - Compression and Molding Press # 60;
Z001 - Finese Area;
Z002 - Halo Secondaries;
Z003 - Tool Shop Cold Cleaner;
Z004 - Maint. Shop Cold Cleaner;
Z005 - Saturn Lift Gate Bonding;
Z006 - Saturn Defect Repair; and
Z007 - Paint Mix Tanks.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0123010202 Emissions Unit ID: R008 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
Coating line with flash tunnel and drying oven, controlled with catalytic incinerator.	OAC rule 3745-21-07(G)	None (See A.I.2.a below.)

2. Additional Terms and Conditions

- a. This emissions unit is exempt from the emission limitations of OAC rule 3745-21-07(G) because, pursuant to OAC rule 3745-21-07(G)(9)(c), no photochemically reactive materials are employed.
- b. The oven associated with this coating line is a drying oven. The permittee shall not allow any liquid organic material or substance containing liquid organic material to come into contact with flame or to be baked, heat-cured, or heat-polymerized, in the presence of oxygen in the oven.

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II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the company identification of each coating and cleanup material employed in this emissions unit, and
 - b. whether or not each coating and cleanup material employed is a photochemically reactive material.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the Ohio EPA, Central District Office) within 30 days of the deviation.

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
Coating line with flash tunnel and drying oven, controlled with catalytic incinerator.	OAC rule 3745-31-05 (PTI 01-1495)	Organic compound (OC) emissions shall not exceed 126.5 tons/year as a rolling, 12-month summation. Emissions from the use of methyl ethyl ketone (MEK) as a cleanup material shall not exceed 9.2 tons/year as a rolling, 12-month summation.

See B.I.2.a, B.II.2 and B.II.3 below.

2. **Additional Terms and Conditions**

- a. The catalytic incinerator controlling emissions from this emissions unit shall operate at a minimum destruction and removal efficiency (DRE) of 90 percent.

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II. **Operational Restrictions**

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The OC content of any coating employed by this emissions unit shall not exceed 5.4 lbs/gallon, as applied.
3. The permittee shall not employ more than 2,750 gallons of MEK, as a cleanup material, per rolling, 12-month period.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall record the following information for each operating day:

- a. a log or record of down time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average

temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

2. The permittee shall collect and record the following information for each month:

- a. the company identification for each coating employed;
- b. the number of gallons of each coating employed;
- c. the number of gallons of MEK employed;
- d. the OC content of each coating, in pounds/gallon;
- e. the total, uncontrolled OC emission rate for MEK, in pounds, i.e., $(6.7 \text{ lbs/gal}) \times (\text{B.III.2.c})$;
- f. the total, uncontrolled OC emission rate for all coatings, in pounds, i.e., the sum of $(\text{B.III.2.b}) \times (\text{B.III.2.d})$ for all coatings identified in B.III.2.a;
- g. the total OC emission rate for all coatings and MEK, in pounds, i.e., $(\text{B.III.2.e}) + [(\text{B.III.2.f}) \times (1 - \text{FRAC})] + [(\text{B.III.2.f}) \times (1 - \text{DRE}) \times (\text{FRAC})]$, where DRE = destruction/removal efficiency demonstrated during the most recent performance test that showed compliance, and FRAC = the fraction of the emissions directed to the control, as determined by the latest engineering calculations and test methods that demonstrated compliance;
- h. the rolling, 12-month summation of total OC emissions, in tons; and
- i. the rolling, 12-month summations of MEK usage, in gallons, and MEK emissions, in tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any exceedances of the following:
 - a. all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature limitations specified above;
 - b. the rolling, 12-month OC emission limitation;
 - c. the rolling, 12-month MEK emission limitation;
 - d. the rolling, 12-month MEK usage limitation; and
 - e. the coating OC content limitation.

These reports shall be submitted in accordance with Section A.1.c.ii of the General Terms and Conditions.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall also submit annual reports which specify the total OC and MEK emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of these terms and conditions shall be determined in accordance with the following method(s):
2. Emission Limitations -

Minimum destruction and removal efficiency (DRE) of 90 percent.

Applicable Compliance Method -

The permittee shall conduct, or have conducted, emission testing for this emissions unit to demonstrate compliance with the minimum DRE requirement, and to determine the annual OC and MEK emissions, in accordance with the following requirements:

 - a. the emission testing shall be conducted within 6 months following permit issuance and again within 6 months prior to permit renewal;
 - b. the tests shall be conducted while this emissions unit is venting emissions to the catalytic incinerator and

operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA; and

c. the capture efficiency (i.e., the fraction of emissions directed to the control system) shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).
4. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
5. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.
6. Emission Limitation -
126.5 tons of OC/year

Applicable Compliance Method -
Compliance shall be determined based upon the latest engineering calculations and emission test results which demonstrated compliance and the records required in Section B.III.2 of these terms and conditions.
7. Emission Limitation -
9.2 tons of MEK/year

Applicable Compliance Method -
Compliance shall be determined based upon the records required in Section B.III.2 of these terms and conditions.
8. Emission Limitation -
5.4 lbs of OC/gallon, as applied

Applicable Compliance Method -
Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings.

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VI. **Miscellaneous Requirements**

1. None