

Facility ID: 1431403268 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.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit K002](#)

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Facility ID: 1431403268 Emissions Unit ID: K001 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>
K001 - miscellaneous metal parts paint spray booth	OAC rule 3745-31-05(A)(3) (PTI 14-1146)	Volatile Organic Compound emissions from the paint spray booth shall not exceed 6.46 tons per year including coatings and cleanup materials.
		See Sections A.2.b., A.2.c., A.2.d. and A.2.e.
	OAC rule 3745-21-09(U)(2)(f)	See Section A.2.a.
	OAC rule 3745-17-11(C)	See term A.2.e. See Sections C.2, C.3 and C.4.

2. Additional Terms and Conditions

- (a) Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI #14-1146, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09. Coatings applied in the coating operations shall not exceed 5.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average. The maximum annual coating usage for this emissions unit shall not exceed 1,900 gallons. The maximum annual cleanup usage for this emissions unit shall not exceed 500 gallons. The permittee shall operate the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating material employed;
 - c. the VOC content of each coating, as applied, in pounds per gallon, excluding water and exempt solvents;
 - d. the name and identification of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material employed, in pounds per gallon;
 - g. the monthly, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC2; and
 - h. the total VOC emissions for the calendar year from all coatings and cleanup materials employed, in tons per year [summation of (C.1.b x C.1.c) plus the summation of (C.1.e x C.1.f) for all months of the calendar year.]
2. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

3. The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

4. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual coating and cleanup usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the monthly volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit semiannual reports summarizing the information required in section C.1. These reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months.

E. Testing Requirements

1. Emissions Limitation:
Volatile Organic Compound emissions from the paint spray booth shall not exceed 6.46 tons per year including coatings and cleanup materials.

Applicable Compliance Method:
Compliance with the annual VOC emissions limitation shall be determined by the record keeping requirements specified in section C.1. The annual limitation was calculated by the following equation: $[(1900 \text{ gallons coating/yr} \times 5.0 \text{ lbs of VOC/gal}) + (500 \text{ gallons cleanup/yr} \times 6.64 \text{ lbs of VOC/gal})] \times 1 \text{ ton}/2000 \text{ lbs}$.
2. VOC content Limitation:
Coatings applied in the coating operations shall not exceed 5.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average.

Applicable Compliance Method:
Compliance with the VOC content limitation shall be determined by the record keeping requirements specified in section C.1. If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings and cleanup materials, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Usage Limitation:
The maximum annual coating usage for this emissions unit shall not exceed 1,900 gallons.

Applicable Compliance Method:
Compliance with the annual coating usage limitation shall be determined by the record keeping requirements specified in section C.1.
4. Usage Limitation:
The maximum annual cleanup usage for this emissions unit shall not exceed 500 gallons.

Applicable Compliance Method:
Compliance with the annual coating usage limitation shall be determined by the record keeping requirements specified in section C.1.

F. Miscellaneous Requirements

1. None

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Facility ID: 1431403268 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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>
K002 - miscellaneous metal parts paint spray booth	OAC rule 3745-31-05(A)(3) (PTI 14-1146)	Volatile Organic Compound emissions from the paint spray booth shall not exceed 1.28 tons per year including coatings and cleanup materials.
	OAC rule 3745-21-09(U)(2)(f)	See Sections A.2.b., A.2.c., A.2.d. and A.2.e.
	OAC rule 3745-17-11(C)	See Section A.2.a. See Term A.2.e. See Sections C.2, C.3 and C.4.

2. Additional Terms and Conditions

- (a) Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI #14-1146, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09. Coatings applied in the coating operations shall not exceed 5.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average. The maximum annual coating usage for this emissions unit shall not exceed 375 gallons. The maximum annual cleanup usage for this emissions unit shall not exceed 100 gallons. The permittee shall operate the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating material employed;
 - c. the VOC content of each coating, as applied, in pounds per gallon, excluding water and exempt solvents;
 - d. the name and identification of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material employed, in pounds per gallon;
 - g. the monthly, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC2; and
 - h. the total VOC emissions for the calendar year from all coatings and cleanup materials employed, in tons per year [summation of (C.1.b x C.1.c) plus the summation of (C.1.e x C.1.f) for all months of the calendar year.]
2. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
3. The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes

the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

4. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual coating and cleanup usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the monthly volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit semiannual reports summarizing the information required in section C.1. These reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months.

E. Testing Requirements

1. **Emission Limitation:**
Volatile Organic Compound emissions from the paint spray booth shall not exceed 1.28 tons per year including coatings and cleanup materials.

Applicable Compliance Method:
Compliance with the annual VOC emissions limitation shall be determined by the record keeping requirements specified in section C.3. The annual limitation was calculated by the following equation: $\{[(375 \text{ gallons coating/yr}) \times (5.0 \text{ lbs/gal}) \times (1 \text{ ton}/2000 \text{ lbs})] + [(100 \text{ gallons cleanup/yr}) \times (6.64 \text{ lbs/gal}) \times (1 \text{ ton}/2000 \text{ lbs})]\}$.
2. **VOC Content Limitation:**
Coatings applied in the coating operations shall not exceed 5.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average.

Applicable Compliance Method:
Compliance with the VOC content limitation shall be determined by the record keeping requirements specified in section C.1. If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings and cleanup materials, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. **Usage Limitation:**
The maximum annual coating usage for this emissions unit shall not exceed 375 gallons.

Applicable Compliance Method:
Compliance with the annual coating usage limitation shall be determined by the record keeping requirements specified in section C.1.
4. **Usage Limitation:**
The maximum annual cleanup usage for this emissions unit shall not exceed 100 gallons.

Applicable Compliance Method:
Compliance with the annual coating usage limitation shall be determined by the record keeping requirements specified in section C.1.

F. Miscellaneous Requirements

1. None