

Facility ID: 1431403974 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: 1431403974 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 Spray Booth	OAC rule 3745-31-05(A)(3) (PTI 14-04348)	Volatile organic compound emissions shall not exceed 46.15 lbs/day and 4.03 TPY.  Particulate matter emissions less than 10 microns (PM10) shall not exceed 0.551 lb/hour.  Particulate matter and PM10 emissions shall not exceed 2.41 TPY.  See term A.2.a, A.2.b and Sections B.1 and B.2.  The requirements of this rule also include compliance with OAC rules 3745-17-07(A)(1), 3745-17-11, and 3745-21-09(U)(1).
	OAC rule 3745-21-09(U)(1)	Exempt pursuant to OAC 3745-21-09(U)(2)(f)(ii).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11	Particulate matter emissions shall not exceed 0.551 lb/hour.

2. **Additional Terms and Conditions**
  - (a) The VOC content for each coating employed in this emissions unit shall not exceed 5.0 lbs/gallon. The VOC content for each cleanup material employed in this emissions unit shall not exceed 6.15 lbs/gallon.

**B. Operational Restrictions**

1. The coating material usage shall not exceed 8 gallons per day and 1306 gallons per year.
2. The cleanup material usage shall not exceed one gallon per day and 250 gallons per year.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the usage, in gallons of each coating employed;
  - c. the usage, in gallons of each cleanup material;
  - d. the VOC content of each coating, as applied, in pounds per gallon;
  - e. the VOC content of each cleanup material, in pounds per gallon;
  - f. the VOC emissions from this emissions unit, i.e., the sum of (b) times (d) for each coating and (c) times (e) for

each cleanup material employed, in pounds;

- g. the total usage, in gallons of all coatings employed; and
- h. the total usage, in gallons of all cleanup materials employed.

2. The permit to install for this emissions unit (K001) 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: 1,2,4 - Trimethylbenzene

TLV (ug/m3): 122,900

Maximum Hourly Emission Rate (lbs/hr): 5.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 394.3

MAGLC (ug/m3): 2926

Physical changes to or 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 Toxics 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 the "Air Toxic Policy" include the following:

- 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 previously modeled;
- 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 with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01, and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition, 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 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record which shows an exceedance of the VOC content limits for coatings and/or cleanup materials, the daily VOC emission limit, and/or the daily usage limits. The notification shall include a copy of each such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days of the exceedance.
- 2. The permittee shall also submit annual reports which summarize the annual coating and cleanup material usage and the annual VOC emissions from this emissions unit. 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 emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
  - Applicable Compliance Method:  
Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
  - b. Emission Limitation:  
The VOC content for each coating employed shall not exceed 5.0 lbs/gallon.

The VOC content for each cleanup material employed shall not exceed 6.15 lbs/gallon.

Applicable Compliance Method:

USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:

Volatile organic compound emissions shall not exceed 46.15 lbs/day and 4.03 TPY.

Applicable Compliance Method:

The VOC emissions limitation is determined by multiplying the daily coating usage of 8 gallons per day by the coating VOC content limit of 5.0 lbs/gallon then adding the daily cleanup emissions of 6.15 lbs/day (1 gallon/day times 6.15 lbs/gallon). Compliance with the annual VOC emissions limit will be determined by summing the daily VOC emissions in Section C.1.

d. Emission Limitation:

Particulate matter and PM10 emissions shall not exceed 0.551 lb/hour.

Particulate matter and PM10 emissions shall not exceed 2.41 TPY.

Applicable Compliance Method:

The lb/hour particulate matter emissions rate is based on the minimum process weight rate from Table I of OAC rule 3745-17-11. The annual limit was determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton. All particulate emissions were assumed to be PM10.

2. Compliance with the usage limits in Section B.1 and B.2 shall be determined based upon the record keeping in Section C.1.

F. **Miscellaneous Requirements**

1. None