

Facility ID: 1431484181 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 R001](#)
- [Go to Part II for Emissions Unit R002](#)
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Facility ID: 1431484181 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Paint spray and baking booth with downdraft	OAC rule 3745-31-05(A)(3) (PTI 14-05719)	Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.
	OAC rule 3745-17-11(C)	See terms and conditions B.1 and B.2. See term A.2.b. See sections C.4, C.5 and C.6.

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. 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. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R001:
 - Clearcoat: 1000 gallons per year
 - Basecoat: 500 gallons per year
 - Primer: 1000 gallons per year
 - Cleanup Material: 1 gallon per day and 330 gallons per year
2. The OC content of the materials employed in emissions unit R001 shall not exceed the following limits, as applied:
 - Clearcoat: 4.3 pounds OC per gallon
 - Basecoat: 6.2 pounds OC per gallon
 - Primer: 4.5 pounds OC per gallon
 - Cleanup material: 7.05 pounds OC per gallon

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.

[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 and the material use 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 (R001) 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: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 564

MAGLC (ug/m3): 10,338

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 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) 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.
- 4. 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.
- 5. 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.

6. 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 deviation (excursion) reports which include the following information for this emissions unit:
 - 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 permittee 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 R001 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 terms C.1. and C.2.
2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 - Emission Limitation(s):
 - Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.
 - 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

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Facility ID: 1431484181 Emissions Unit ID: R002 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>
R002 - Paint spray and baking booth with downdraft	OAC rule 3745-31-05(A)(3) (PTI 14-05719)	Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

See terms and conditions B.1 and B.2.

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.
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. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R002:

Clearcoat: 1000 gallons per year
Basecoat: 500 gallons per year
Primer: 1000 gallons per year
Cleanup Material: 1 gallon per day and 330 gallons per year
2. The OC content of the materials employed in emissions unit R002 shall not exceed the following limits, as applied:

Clearcoat: 4.3 pounds OC per gallon
Basecoat: 6.2 pounds OC per gallon
Primer: 4.5 pounds OC per gallon
Cleanup material: 7.05 pounds OC per gallon

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.

[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 and the material use 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 (R002) 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: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 564

MAGLC (ug/m3): 10,338

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 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) 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.
4. 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.
 5. 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.
 6. 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 deviation (excursion) reports which include the following information for this emissions unit:

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 permittee 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 R002 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 terms C.1. and C.2.
 2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 Emission Limitation(s):
 Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.
 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

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Facility ID: 1431484181 Emissions Unit ID: R003 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>
R003 - Paint spray and baking booth with downdraft	OAC rule 3745-31-05(A)(3) (PTI 14-05719)	Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

See terms and conditions B.1 and B.2.

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.
 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. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R003:
 Clearcoat: 1000 gallons per year
 Basecoat: 500 gallons per year
 Primer: 1000 gallons per year
 Cleanup Material: 1 gallon per day and 330 gallons per year
2. The OC content of the materials employed in emissions unit R003 shall not exceed the following limits, as applied:
 Clearcoat: 4.3 pounds OC per gallon

Basecoat: 6.2 pounds OC per gallon
 Primer: 4.5 pounds OC per gallon
 Cleanup material: 7.05 pounds OC per gallon

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.

[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 and the material use 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 (R003) 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: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 564

MAGLC (ug/m3): 10,338

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 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) 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.

4. 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.
5. 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.

6. 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 deviation (excursion) reports which include the following information for this emissions unit:
 - 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 permittee 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 R003 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 terms C.1. and C.2.
2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 - Emission Limitation(s):
 - Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.
 - 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

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

Facility ID: 1431484181 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R004 - Paint spray and baking booth with downdraft	OAC rule 3745-31-05(A)(3) (PTI 14-05719)	Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

See terms and conditions B.1 and B.2.

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. 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. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R004:
 - Clearcoat: 1000 gallons per year
 - Basecoat: 500 gallons per year
 - Primer: 1000 gallons per year
 - Cleanup Material: 1 gallon per day and 330 gallons per year
2. The OC content of the materials employed in emissions unit R004 shall not exceed the following limits, as applied:
 - Clearcoat: 4.3 pounds OC per gallon
 - Basecoat: 6.2 pounds OC per gallon
 - Primer: 4.5 pounds OC per gallon
 - Cleanup material: 7.05 pounds OC per gallon

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.

[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 and the material use 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: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 564

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after it's 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 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) 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 it's 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.
4. 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.
 5. 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.
 6. 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 deviation (excursion) reports which include the following information for this emissions unit:

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 permittee 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 terms C.1. and C.2.
2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 Emission Limitation(s):
 Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.
 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

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Facility ID: 1431484181 Emissions Unit ID: R005 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>
R005 - Paint spray and baking booth with downdraft	OAC rule 3745-31-05(A)(3) (PTI 14-05719)	Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

See terms and conditions B.1 and B.2.

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.
 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. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R005:
 - Clearcoat: 1000 gallons per year
 - Basecoat: 500 gallons per year
 - Primer: 1000 gallons per year
 - Cleanup Material: 1 gallon per day and 330 gallons per year

2. The OC content of the materials employed in emissions unit R005 shall not exceed the following limits, as applied:
 - Clearcoat: 4.3 pounds OC per gallon
 - Basecoat: 6.2 pounds OC per gallon
 - Primer: 4.5 pounds OC per gallon
 - Cleanup material: 7.05 pounds OC per gallon

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.

[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 and the material use 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 (R005) 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: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 564

MAGLC (ug/m3): 10,338

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 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) 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.
4. 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.
 5. 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.

6. 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 deviation (excursion) reports which include the following information for this emissions unit:

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 permittee 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 R005 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 terms C.1. and C.2.
2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitation(s):

Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

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

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

Facility ID: 1431484181 Emissions Unit ID: R006 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>
R006 - Paint spray and baking booth with downdraft	OAC rule 3745-31-05(A)(3) (PTI 14-05719)	Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

See terms and conditions B.1 and B.2.

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. 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. The permittee shall not exceed the following usage limits when employing coatings and cleanup materials in emissions unit R006:
 - Clearcoat: 1000 gallons per year
 - Basecoat: 500 gallons per year
 - Primer: 1000 gallons per year
 - Cleanup Material: 1 gallon per day and 330 gallons per year
2. The OC content of the materials employed in emissions unit R006 shall not exceed the following limits, as applied:
 - Clearcoat: 4.3 pounds OC per gallon
 - Basecoat: 6.2 pounds OC per gallon
 - Primer: 4.5 pounds OC per gallon
 - Cleanup material: 7.05 pounds OC per gallon

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.

[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 and the material use 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 (R006) 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: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 564

MAGLC (ug/m3): 10,338

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 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) 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.
4. 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.
 5. 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.
 6. 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 deviation (excursion) reports which include the following information for this emissions unit:

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 permittee 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 R006 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 terms C.1. and C.2.
2. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitation(s):

Organic compound (OC) emissions from this emissions unit shall not exceed 40 pounds per day 7.2 tons per year.

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