Facility ID: 1483090257 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 1483090257 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Line #2 Side Seam Spray Booth	PTI 14-3933	See A.2.2.a., b., c. and d.
-	OAC 3745-21-09(U)(1)(e),(f).	Less stringent than PTI.

2. **Additional Terms and Conditions**

   (a) The VOC content of each coating or cleanup material employed in emissions units K001 through K005 shall not exceed the following: for interior coatings - 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents; for exterior coatings - 3.34 pounds of VOC per gallon of coating, excluding water and exempt solvents; and for cleanup materials - 7.5 pounds of VOC per gallon.
   The VOC emissions for K001 through K005 combined shall not exceed the following:

   i. Exterior Coatings: 2672 pounds VOC per day and 65.7 tons VOC per year, based upon a rolling, 12-month summation;

   ii. Interior Coatings: 2795 pounds VOC per day and 25.6 tons VOC per year, based upon a rolling, 12-month summation; and

   iii. Cleanup Materials: 563 pounds VOC per week and 6 tons VOC per year, based upon a rolling, 12-month summation.
   The annual combined VOC emissions from emission units K001-K005 shall not exceed 97.3 TPY, based upon a rolling, 12-month summation.
   The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. **Operational Restrictions**

1. The permittee shall not exceed the following coating and cleanup materials usage limits for emission units K001-K005 combined: 39,340 gallons per year for exterior coatings, 11,896 gallons per year for interior coatings, and 1600 gallons per year for cleanup materials.

   Compliance with the annual usage limitations shall be based upon rolling, 12-month summations. The permittee may exceed the annual usage limitations after the first 12 months of operation, provided that the 12-month, rolling VOC emission limitation for each coating type is not exceeded.

2. The permittee shall not employ coating and cleanup materials in excess of 800 gallons per day.

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

1. The permittee shall maintain the following daily records for each surface coating and cleanup material employed in emission units K001 through K005:

   a. the company identification of each interior coating, exterior coating, and cleanup material;

   b. the number of gallons of each interior coating, exterior coating, and cleanup material employed;

   c. the VOC content, in pounds of VOC per gallon, of each interior coating, exterior coating, and cleanup material, excluding water and exempt solvents;

   d. the total daily VOC emissions, in pounds, for:

i. all interior coatings;
ii. all exterior coatings; and
iii. all cleanup materials.

2. The permittee shall maintain the following monthly records for each surface coating and cleanup material employed in emission units K001 through K005:

a. for each month, the rolling, 12-month usage summation, in gallons, for:

i. all interior coatings;
ii. all exterior coatings; and
iii. all cleanup materials.

b. for each month, the rolling, 12-month organic compound emissions summation, in pounds, for:

i. all interior coatings;
ii. all exterior coatings; and
iii. all cleanup materials.

3. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emission units K001 through K005:

a. the name and identification number of each coating, as applied;
b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
d. the number of gallons of each coating employed;
e. the name and identification of each cleanup material employed;
f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
h. the number of gallons of each cleanup material employed.
i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for all of the coatings plus the sum of (f) times (h) for all of the cleanup materials);
j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for all of the coatings plus the sum of (g) times (h) for all of the cleanup materials);
k. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months); and
l. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months).
A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation reports which summarize any exceedance of the following: VOC content limits, VOC emission limits, coating usage limits (for all interior coatings, all exterior coatings, and all cleanup materials employed in emission units K001-K005), and the individual and combined HAP emission limits. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances.

2. The permittee shall submit annual reports which summarize the following:

a. the TPY VOC emissions from all interior coatings, exterior coatings, and cleanup materials employed in emission units K001 through K005, combined;

b. the TPY HAP emissions for each individual HAP and for all combined HAPS from emission units K001-K005, combined; and

c. the total usage of all exterior coatings, interior coatings, and cleanup materials employed in emission units K001 through K005 combined, for the previous calendar year, in gallons.

E. **Testing Requirements**

1. U.S. EPA Method 24 shall be used to determine the VOC and HAP contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Compliance with the VOC emission limits in section A.2.2.b. shall be demonstrated by the recordkeeping requirements in section C.1. of these terms and conditions.

3. Compliance with the HAP emission limits in section A.2.2.d. shall be demonstrated by the recordkeeping requirements in section C.3 of these terms and conditions.

4. Compliance with the usage limits in section B.1. shall be determined by the recordkeeping requirements in section C.2. of these terms and conditions.

F. **Miscellaneous Requirements**

None