

Facility ID: 1483090288 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: 1483090288 Emissions Unit ID: P005 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>
P005-Facility-wide solvent cleanup operation	OAC rule 3745-31-05(A)(3) 14-05530	Organic Compound (OC) emissions shall not exceed 50.2 pounds per day and 9.05 TPY.

See term A.2.b and section B.1.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the clean-up material usage limitations, the organic content limitation and the emissions limitations. The organic compound (OC) content of any cleanup solvent employed in this emissions unit shall not exceed 9.1 pounds of OC per gallon of cleanup solvent. The daily emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The maximum annual organic cleanup solvent usage for emissions unit P005 shall not exceed 1990 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month:
 - a. The company identification for each organic cleanup solvent employed.
 - b. The number of gallons of each organic cleanup solvent employed.
 - c. The organic compound content of each organic cleanup solvent employed, in pounds per gallon.
 - d. The total organic compound emission rate for all organic cleanup solvents employed, in pounds [calculated by taking the sum of (c) times (d) for each organic cleanup solvent employed].

In addition, these records shall be summarized at the end of each year to calculate the annual organic compound emissions and solvent usage.

2. The permit to install for this emissions unit (P005) 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: Acetone

TLV (ug/m3): 1,187,100

Maximum Hourly Emission Rate (lbs/hr): 2.1

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 306

MAGLC (ug/m3): 28,264

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(AAA)(1)(a)(ii), 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 [other than (AAA)(1)(a)(ii)], 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 submit annual reports which specify the annual organic cleanup solvent usage and the total organic compound emissions from emissions unit P005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup solvents (i.e., for OC contents) or the use of any photochemically reactive cleanup solvent. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations outlined in term and condition A.1 shall be demonstrated in accordance with the following method(s):

Emissions Limitation:
Organic Compound (OC) emissions shall not exceed 50.2 pounds per day and 9.05 TPY.

Applicable Compliance Method:
The daily emissions are determined by multiplying the OC content for the cleanup solvent by the monthly usage rate and dividing by the days of operation. The annual limit is determined by multiplying the maximum OC content for the cleanup solvent by the maximum annual usage rate, then dividing that total by 2000 lb/ton.
2. 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 cleanup solvent.
3. Compliance with the OC content limitation in term A.2.b shall be demonstrated by the record keeping requirements as specified in section C.1.
4. Compliance with the cleanup usage limitations in section B.1 shall be determined by the record keeping requirements as specified in section C.1.

F. Miscellaneous Requirements

1. None