

Facility ID: 1652040018 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: 1652040018 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>
Spray booth with fan and filter used to coat wood furniture. No metal furniture coated at this facility. This emissions unit employs photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5). No curing or flash-off oven employed, coatings air-dried. Emissions of organic compounds uncontrolled. This facility is a natural minor source of volatile organic compounds (VOC), hazardous air pollutants (HAP), and all other applicable pollutants.	OAC rule 3745-21-07(G)(2)	On any day photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are used, the following emissions limits shall apply: 8 pounds of organic compounds per hour; and 40 pounds of organic compounds per day. Emissions from all organic liquids used, not only from photochemically reactive materials, shall be counted in the total organic compound emissions.

2. Additional Terms and Conditions

- (a) The permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment or production procedures, or any other change that would increase the potential emissions of any air pollutant.

B. Operational Restrictions

1. The permittee shall properly employ and maintain spray booth exhaust paint overspray filters at all times the emissions unit is in operation.
2. The permittee shall coat no metal or any other parts or products not specified in the application in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall document each day spray booth exhaust filters serving this emissions unit were not employed as required above in section B.1.
2. The permittee shall document each day metal and/or other types of parts or products not specified in the application were coated in this emissions unit.
3. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[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).]

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record detailing any incident(s) documented above in sections C.1 and/or C.2. 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 of the incident(s).
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation: On any day photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are used, the following emissions limits shall apply:

8 pounds of organic compounds per hour; and

40 pounds of organic compounds per day.

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements of C.3 above.
2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the organic compound contents of the coatings.

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, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the organic compound contents of the cleanup materials.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.