

Facility ID: 1652040035 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: 1652040035 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Metal Parts Spray Paint Booth	OAC Rule 3745-31-05(A)(3) PTI # 16-02388	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(ii)
	OAC rule 3745-21-09(U)(2)(e)	Emissions of organic compounds shall not exceed 11.4 tpy.
		the VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d)
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**
 - (a) The Owner Operator shall only coat metal parts in this emissions unit.

B. Operational Restrictions

1. The Owner/ Operator shall coat only metal parts in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The Owner Operator shall collect and record the following information each day for the coating line when metal parts are coated:
 - a. the name and identification number of each metal coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
 - c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC.2.
2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;

- c. the VOC content of each cleanup material, in pounds per gallon; and
 - d. the total VOC emissions from all cleanup materials, in pounds or tons.
3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-Butoxyethanol

TLV (mg/m³): 96.66

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,158.0

MAGLC (ug/m³): 2,301.4

Physical changes to or changes 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 Toxic 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 applying 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(VV)(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 (VV)(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 still 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. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA, Akron Regional AQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management Office within 45 days after the exceedance occurs.

E. Testing Requirements

- 1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

the VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds VOC per gallon of coating shall be based upon the record keeping specified in Part III, Section A.III.4 of this permit.

Emission Limitation:

11.4 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

Annual organic compound emissions:

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to Part C.1 of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to Part III, Section C.2 of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual reports.

Emission Limitation:

0.551 lb/hr particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

F. **Miscellaneous Requirements**

1. None