

Facility ID: 1652050077 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: 1652050077 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>
Paint spray booth used to coat metal roofing/siding test blanks (i.e., miscellaneous metal parts)	OAC rule 3745-31-05 See F.1 below.	1% opacity as a 6-minute average See A.2.a and B.1 below.
	OAC rule 3745-17-07 See F.1 below.	See A.2.b below.
	OAC rule 3745-17-11 See F.1 below.	0.551 pound per hour of particulate matter
	OAC rule 3745-21-09 See F.1 below.	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- (a) The permittee shall employ and maintain spray booth exhaust fan filter elements to control particulate matter from this emissions unit. The emission limitation required by OAC rule 3745-17-07 is less stringent than the emission limitation as determined using best available technology.

B. Operational Restrictions

1. The maximum average hourly coating usage rate for this emissions unit shall not exceed 2.5 gallons/hour.
2. The maximum annual coating usage for this emissions unit shall not exceed 1200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation, following the issuance of the permit to install, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Coating Usage (in gallons)

- 1 100
- 1-2 200
- 1-3 300
- 1-4 400
- 1-5 500
- 1-6 600
- 1-7 700
- 1-8 800
- 1-9 900
- 1-10 1000
- 1-11 1100
- 1-12 1200

After the first 12 calendar months of operation, following the issuance of the permit to install, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total combined usage of all coatings for each calendar month, in gallons/month;
 - b. during the first 12 calendar months of operation, following the issuance of the permit to install, the permittee shall record the cumulative coating usage, in gallons, for each calendar month; and
 - c. beginning after the first 12 calendar months of operation, following the issuance of the permit to install, the rolling, 12-month summation of the coating usage.
 2. The permittee shall maintain daily records of the following information:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in pounds of VOC per gallon of coating;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all coatings employed;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the daily average hourly coating usage rate, in gallons per hour [i.e., $f = d/e$].
- 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 showing the use of noncomplying coatings. 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 occurrence(s).
 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable average hourly coating usage limit. 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 45 days after the exceedance occurs.
 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following the issuance of the permit to install, all exceedances of the maximum allowable cumulative coating usage levels.
 4. The deviation (excursion) reports shall be submitted in accordance with the requirements in Section 3 of the General Terms and Conditions.
- 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:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

USEPA Method 24 shall be used to determine the VOC contents for all coating formulas used with this coating line. 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. Note: if any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee must either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier.
Emission Limitation:

0.551 lb/hr particulate matter

Applicable Compliance Method:

$$E = P \times S \times (1-TE) \times (1-CE)$$
 where,

E = maximum particulate matter emissions rate (lb/hr);

P = maximum paint usage rate (gals/hr);

S = maximum solids content of paint (lbs/gal);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (TE = 0.7 for the coating application method used at this facility); and

CE = control efficiency of the control equipment (CE = 0.9 for this facility).
Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

USEPA Method 9, 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1702, as issued on November 5, 1997: A, B, C, D, E, and F.
2. This permit allows the use of the coatings specified by the permittee in the permit to install application for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for xylene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for xylene:

Pollutant: xylene

TWA (mg/m3): 434
Maximum Average Hourly Emission Rate (lbs/hr): 8.8
Predicted 1-Hour Maximum Ground-Level Concentration at 21 m (mg/m3): 2.6
MAGLC (mg/m3): 10.3
3. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:
 - a. any changes in the composition of the coatings or the use of new coatings resulting in the emission of a compound with a lower Time-Weighted Average (TWA) threshold limit value as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TWA value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of the MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - d. any change in the composition of the coatings or use of new coatings, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - e. any change in the composition of the coatings or use of new coatings, that would result in an increase in emissions of any hazardous air pollutants as defined in OAC rule 3745-77-01(V).