

Facility ID: 1652050158 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: 1652050158 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>
Surface coating line - four water wash spray booths and bake oven	OAC rule 3745-31-05 (PTI 16-897)	20.0 pounds per hour and 87.6 tons per year of VOC
	OAC rule 3745-21-09(U)(1)(e)	4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for interior coating of a steel drum
	OAC rule 3745-21-09(U)(1)(f)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for exterior coating of a steel drum
	OAC rule 3745-17-07(A)(1)(a)	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)(1)	0.551 pound per hour of particulate matter

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The steel drum coating line, which consists of four spray booths and bake oven, shall employ a water wash to control to control particulate emissions from coating overspray. The water wash collection efficiency shall be sufficient to eliminate visible emissions of particulate matter to ambient air.
2. The permit holder shall minimize VOC emissions from clean-up by use of best available operating practices.

C. Monitoring and/or Record Keeping Requirements

1. When coating the interior of steel drums, the permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for CVOC,2.
2. When coating the exterior of steel drums, the permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and

exempt solvents) of each coating, as applied; and

- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for CVOC,2.
3. The permittee shall collect and record the following information, on a monthly basis, for all coating operations of the emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the number of gallons of spent solvent shipped out for disposal or recycling;
 - d. the VOC content of each coating and cleanup material, in pounds per gallon;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly organic compound emission rate for all coatings and cleanup materials, in pounds per hour (average);
 - h. the VOC content in pounds per gallon of coating, minus water;
 - i. the water content, in percent by volume;
 - j. the solids content, in percent by volume; and
 - k. the density of the volatile organic solvent, in pounds per gallon.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. The spent solvent shipped out for disposal or recycling shall not be included in the emissions calculations.]

These monthly records, as well as any supporting coating analyses or computations, shall be retained in the company files for a period of not less than two years, and shall be made available to the Director or his authorized representative for review during normal business hours.

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 that the daily volume-weighted average VOC content exceeds the applicable limitation for either exterior steel drum coating or interior steel drum coating. 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.
2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average VOC emissions exceeded 20.0 pounds per hour, and the actual VOC emissions for each such day.
3. The deviation reports shall be submitted as specified in General Term and Condition #3 of this permit.
4. The permit holder shall submit annual reports to the Akron Regional Air Quality Management District which summarize monthly coating usage and clean-up information required to be kept under C.3 above. The reports shall be submitted by February 1 of each year and shall cover the previous twelve calendar months (January to December.)

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:

20.0 lbs/hr VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, the number of hours the emissions unit was in operation, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed. The mass of organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). USEPA Methods 24 and 24A shall be used to determine the VOC contents for each coating. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A 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 or 24A.

Emission Limitation:

4.3 lbs of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of steel drums

Applicable Compliance Method:

The daily volume-weighted average VOC content of all coatings, as applied to the interior coating of steel drums, shall be calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for CVOC,2. The mass of organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). USEPA Methods 24 and 24A shall be

used to determine the VOC contents for each coating. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A 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 or 24A.

Emission Limitation:

3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of steel drums

Applicable Compliance Method:

The daily volume-weighted average VOC content of all coatings, as applied to the exterior coating of steel drums, shall be calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for CVOC. The mass of organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). USEPA Methods 24 and 24A shall be used to determine the VOC contents for each coating. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A 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 or 24A.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

Multiply the STAPPA/ALAPCO derived particulate emission factor of 0.206 lb/gal coating by the maximum number of gallons of coating applied per hour.

F. **Miscellaneous Requirements**

1. None