Facility ID: 1667000063 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.

Go to Part II for Emissions Unit K001
Go to Part II for Emissions Unit P001
Go to Part II for Emissions Unit R001

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray paint booth, surface coating of metal and fabric airship parts	OAC rule 3745-31-05(A)(3) (PTI 16-01711)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), and 3745-21-09(U). Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, 40 lbs/hr, and 7.3 tons per year. See A.2.a below.
	OAC rule 3745-21-07(G)(2)	3.0 gallons of coating per day for any day in which metal parts are coated.
	OAC rule 3745-21-09(U)	

2. **Additional Terms and Conditions**

   (a) The emissions limitation based on OAC rule 3745-21-07(G) is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the daily operating hours and monthly operating days for this emissions unit.

2. The permittee shall collect and record the following information on a monthly basis 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 emissions from all coatings and photochemically reactive cleanup materials, in pounds; and

   e. the average hourly and average daily organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (average) and pounds per day (average).

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

3. The permittee shall collect and record the total number of gallons of coating employed per day during any day in

which metal parts are coated.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. an identification of each month 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 controlled organic compound emissions for each such month; and

   b. an identification of each month during which the average daily organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such month;

2. The permittee shall notify the Director (the Akron RAQMD) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 45 days after the exceedance occurs

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:

   8.0 lbs/hr of organic compounds

   Applicable Compliance Method:

   Monthly records shall be maintained of the organic compound content of each coating and cleanup material employed, the usage of each coating and cleanup material employed, and the calculated average hourly organic compound emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the organic content of each coating and cleanup material.
   Emission Limitation:

   40.0 lbs/day of organic compounds

   Applicable Compliance Method:

   Monthly records shall be maintained of the organic compound content of each coating and cleanup material employed, the usage of each coating and cleanup material employed, and the calculated daily organic compound emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the organic content of each coating and cleanup material.
   Emission Limitation:

   7.3 tpy of organic compounds

   Applicable Compliance Method:

   As long as complianc with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000 lbs/ton). Formulation data or USEPA Method 24 shall be used to determine the organic content of each coating and cleanup material.

F. **Miscellaneous Requirements**

1. None

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Part II - Special Terms and Conditions

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Airship fueling operations	OAC rule 3745-31-05(A)(3) (PTI 16-01715)	Volatile organic compound (VOC) emissions shall not exceed 136.3 lbs/day.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The permittee shall not permit fuel to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the airship refueling operation:

a. the company identification of each fuel loaded;

b. the daily throughput of each fuel, in gallons;

c. the total number of days the emissions unit was in operation; and

d. the calculated average daily VOC emission rate for all fuels loaded, in pounds per day (average).

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the average daily volatile organic compound emissions exceeded 136.3 pounds per day, and the actual average daily volatile organic compound emissions for each such month. 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.

E. **Testing Requirements**

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
Emission Limitation:

136.3 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated using the AP-42, Section 5.2 loading loss emission equation:

LL = (12.46 * S * P * M)/T

where:
S = saturation factor
P = vapor pressure
M = molecular weight of vapors
T = temperature of liquid loading

The resultant answer can be multiplied by the maximum daily throughput in gallons of fuel per day.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 1667000063 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Goodyear airship operations - surface coating	OAC rule 3745-31-05 (PTI 16-01443)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40 lbs/day.
	OAC rule 3745-21-07(G)(2)	See A.2.a below.

2. **Additional Terms and Conditions**

(a) The emissions limitation based on OAC rule 3745-21-07(G) is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the coating operation:

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 organic compound content of each coating and cleanup material, in pounds per gallon;

d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per month;

e. the total number of hours the emissions unit was in operation;

f. the total number of days the emissions unit was in operation;

g. the average daily organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(f), in pounds per day (average); and

h. the average hourly organic compound emission rate for all coatings and 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.]

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each month during which the average hourly total organic compound emissions exceeded 8.0 lbs/hr, and the actual average hourly organic compound emissions for each such month; and

b. an identification of each month during which the average daily total organic compound emissions exceeded 40.0 lbs/day, and the actual average daily total organic compound emissions for each such month.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term 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:

8.0 lbs/hr of OC
40.0 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements of section C.1 of this permit.

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 organic compound contents of the coatings and inks.

F. **Miscellaneous Requirements**

1. None