

Facility ID: 1667020040 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.

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Facility ID: 1667020040 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>
laquer saturant application line #1	OAC rule 3745-31-05 (PTI 16-1824)	19.7 lbs/day of organic compounds (OC) for coatings and thinning solvents 3.7 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation.
The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05.
If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;

- d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
2. The permittee shall calculate and record the following daily information each week for each coating line:
- a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).
- The calculations shall be performed for each day that any of the coating lines were in operation.
3. The permittee shall collect and record the following information each month for each coating line:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).
- A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.
3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

19.7 lbs/day of OC
3.7 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 through K006. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 4.925 for K001 - K006

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 12580.0

MAGLC (ug/m3): 28285.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1667020040 Emissions Unit ID: K002 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>
laquer saturant application line #2	OAC rule 3745-31-05 (PTI 16-1824)	19.7 lbs/day of organic compounds (OC) for coatings and thinning solvents 3.7 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. **Additional Terms and Conditions**
 - (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation. The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05. If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;

- i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
2. The permittee shall calculate and record the following daily information each week for each coating line:
- a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).
- The calculations shall be performed for each day that any of the coating lines were in operation.
3. The permittee shall collect and record the following information each month for each coating line:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).
- A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.

3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

19.7 lbs/day of OC
3.7 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 through K006. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 4.925 for K001 - K006

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 12580.0

MAGLC (ug/m3): 28285.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1667020040 Emissions Unit ID: K003 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>
laquer saturant application line #3	OAC rule 3745-31-05 (PTI 16-1824)	19.7 lbs/day of organic compounds (OC) for coatings and thinning solvents 3.7 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation. The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05. If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
2. The permittee shall calculate and record the following daily information each week for each coating line:

- a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.

3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).

A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.
3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

19.7 lbs/day of OC
3.7 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 through K006. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 4.925 for K001 - K006

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 12580.0

MAGLC (ug/m3): 28285.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K004 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>
laquer saturant application line #4	OAC rule 3745-31-05 (PTI 16-1824)	19.7 lbs/day of organic compounds (OC) for coatings and thinning solvents 3.7 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation.
The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05.
If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
- 2. The permittee shall calculate and record the following daily information each week for each coating line:
 - a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.

3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
 4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).

A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.
 3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

19.7 lbs/day of OC
3.7 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to

determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 through K006. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 4.925 for K001 - K006

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12580.0

MAGLC (ug/m3): 28285.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K005 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>
laquer saturant application line #5	OAC rule 3745-31-05 (PTI 16-1824)	19.7 lbs/day of organic compounds (OC) for coatings and thinning solvents 3.7 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation.
The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05.
If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
- 2. The permittee shall calculate and record the following daily information each week for each coating line:
 - a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.
- 3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).

4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
- the name and identification number of each coating, as applied;
 - the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - the number of gallons of each coating employed;
 - the name and identification of each cleanup material employed;
 - the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - the number of gallons of each cleanup material employed;
 - the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).
- A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 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

- 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 maximum daily coating and thinning solvent 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.
- The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.
- The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

- 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:

19.7 lbs/day of OC
3.7 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

- This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 through K006. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 4.925 for K001 - K006

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12580.0

MAGLC (ug/m3): 28285.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K006 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>
laquer saturant application line #6	OAC rule 3745-31-05 (PTI 16-1824)	19.7 lbs/day of organic compounds (OC) for coatings and thinning solvents 3.7 tpy of OC for coatings, thinning solvents, and

cleanup materials

See A.2.a and A.2.c below.

OAC rule 3745-21-09(U)(2)(e)

See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation.
The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05.
If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:
- the name and identification number of each coating employed;
 - the initial volume of each coating in each dip chamber, in gallons;
 - the final volume of each coating in each dip chamber, in gallons;
 - the volume of each coating added to each dip chamber, in gallons;
 - the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - the OC content of each coating employed, in pounds per gallon;
 - the total volume, in gallons, of all of the coatings employed;
 - the name and identification number of each thinning solvent employed;
 - the volume, in gallons, of each thinning solvent employed;
 - the OC content of each thinning solvent employed, in pounds per gallon;
 - the total volume, in gallons, of all of the thinning solvents employed; and
 - the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
2. The permittee shall calculate and record the following daily information each week for each coating line:
- the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).
- The calculations shall be performed for each day that any of the coating lines were in operation.
3. The permittee shall collect and record the following information each month for each coating line:
- the name and identification of each cleanup material employed;
 - the OC content of each cleanup material, in pounds per gallon;
 - the number of gallons of each cleanup material employed; and
 - the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
- the name and identification number of each coating, as applied;
 - the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

- d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).

A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.
- 3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
- 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

19.7 lbs/day of OC
3.7 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

- 1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K001 through K006. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 4.925 for K001 - K006

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12580.0

MAGLC (ug/m3): 28285.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K007 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>
silicones and enamels saturant application line #7	OAC rule 3745-31-05 (PTI 16-1824)	55.4 lbs/day of organic compounds (OC) for coatings and thinning solvents 10.6 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation.
The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-

31-05.

If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:

- a. the name and identification number of each coating employed;
- b. the initial volume of each coating in each dip chamber, in gallons;
- c. the final volume of each coating in each dip chamber, in gallons;
- d. the volume of each coating added to each dip chamber, in gallons;
- e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
- f. the OC content of each coating employed, in pounds per gallon;
- g. the total volume, in gallons, of all of the coatings employed;
- h. the name and identification number of each thinning solvent employed;
- i. the volume, in gallons, of each thinning solvent employed;
- j. the OC content of each thinning solvent employed, in pounds per gallon;
- k. the total volume, in gallons, of all of the thinning solvents employed; and
- l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).

2. The permittee shall calculate and record the following daily information each week for each coating line:

- a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
- b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
- c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.

3. The permittee shall collect and record the following information each month for each coating line:

- a. the name and identification of each cleanup material employed;
- b. the OC content of each cleanup material, in pounds per gallon;
- c. the number of gallons of each cleanup material employed; and
- d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).

4. The permittee shall collect and record the following information each month for emissions units K001 through K010:

- a. the name and identification number of each coating, as applied;
- b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
- h. the number of gallons of each cleanup material employed;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and

j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).

A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. 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

- 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 maximum daily coating and thinning solvent 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.
- The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 55.4 lbs/day, and the actual daily OC emissions for each such day.
- The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

- 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:

55.4 lbs/day of OC
10.6 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

- This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K007 through K010. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: n-butyl alcohol

TLV (mg/m3): 112

Maximum Hourly Emission Rate (lbs/hr): 1.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2395.0

MAGLC (ug/m3): 2667.2

Pollutant: 2-butoxy-ethanol

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 958.0

MAGLC (ug/m3): 2881.0

Pollutant: ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.2 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2874.0

MAGLC (ug/m3): 10333.3

Pollutant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 958.0

MAGLC (ug/m3): 1238.1

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.6 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3832.0

MAGLC (ug/m3): 4476.2

Pollutant: trimethyl benzene (CAS 25551-13-7)

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 0.8 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1916.0

MAGLC (ug/m3): 2928.6

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4790.0

MAGLC (ug/m3): 10333.3

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K008 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>
silicones and enamels saturant application line #8	OAC rule 3745-31-05 (PTI 16-1824)	55.4 lbs/day of organic compounds (OC) for coatings and thinning solvents 10.6 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation.
The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05.
If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;

- i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
- 2. The permittee shall calculate and record the following daily information each week for each coating line:
 - a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.
- 3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
- 4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).

A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
- 5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
 - 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 55.4 lbs/day, and the actual daily OC emissions for each such day.

3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

55.4 lbs/day of OC
10.6 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.
- F. Miscellaneous Requirements**
1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K007 through K010. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: n-butyl alcohol

TLV (mg/m3): 112

Maximum Hourly Emission Rate (lbs/hr): 1.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2395.0

MAGLC (ug/m3): 2667.2

Pollutant: 2-butoxy-ethanol

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 958.0

MAGLC (ug/m3): 2881.0

Pollutant: ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.2 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2874.0

MAGLC (ug/m3): 10333.3

Pollutant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 958.0

MAGLC (ug/m3): 1238.1

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.6 for K007-K010

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 3832.0

MAGLC (ug/m3): 4476.2
Pollutant: trimethyl benzene (CAS 25551-13-7)

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 0.8 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1916.0

MAGLC (ug/m3): 2928.6

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4790.0

MAGLC (ug/m3): 10333.3

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K009 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>
silicones and enamels saturant application line #9	OAC rule 3745-31-05 (PTI 16-1824)	55.4 lbs/day of organic compounds (OC) for coatings and thinning solvents 10.6 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. **Additional Terms and Conditions**

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation. The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05. If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
2. The permittee shall calculate and record the following daily information each week for each coating line:
 - a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.
3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).

4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
- the name and identification number of each coating, as applied;
 - the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - the number of gallons of each coating employed;
 - the name and identification of each cleanup material employed;
 - the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - the number of gallons of each cleanup material employed;
 - the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).
- A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 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

- 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 maximum daily coating and thinning solvent 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.
- The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 55.4 lbs/day, and the actual daily OC emissions for each such day.
- The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

- 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:

55.4 lbs/day of OC
10.6 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

- This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K007 through K010. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: n-butyl alcohol

TLV (mg/m3): 112

Maximum Hourly Emission Rate (lbs/hr): 1.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2395.0

MAGLC (ug/m3): 2667.2

Pollutant: 2-butoxy-ethanol

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 958.0

MAGLC (ug/m3): 2881.0

Pollutant: ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.2 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2874.0

MAGLC (ug/m3): 10333.3

Pollutant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 958.0

MAGLC (ug/m3): 1238.1

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.6 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3832.0

MAGLC (ug/m3): 4476.2

Pollutant: trimethyl benzene (CAS 25551-13-7)

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 0.8 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1916.0

MAGLC (ug/m3): 2928.6

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4790.0

MAGLC (ug/m3): 10333.3

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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 specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667020040 Emissions Unit ID: K010 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>
silicones and enamels saturant application line #10	OAC rule 3745-31-05 (PTI 16-1824)	55.4 lbs/day of organic compounds (OC) for coatings and thinning solvents 10.6 tpy of OC for coatings, thinning solvents, and cleanup materials See A.2.a and A.2.c below.
	OAC rule 3745-21-09(U)(2)(e)	See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall employ no more than 3.0 gallons of coatings and thinning solvents for each day the emissions unit is in operation. The emissions limitation based on this applicable rule is less stringent than the emissions limitation established in accordance with the best available technology requirement specified in OAC rule 3745-31-05. If the emissions of any individual hazardous air pollutant (HAP) or the emissions of total combined hazardous air pollutants (HAPs) exceed 10.0 tpy or 25.0 tpy, respectively, then the permittee shall apply for a Title V permit.

The maximum potentials to emit, in tpy, for each individual HAP and for total combined HAPs currently employed are less than the Title V thresholds of 10 tpy and 25 tpy, respectively. Record keeping requirements have been added which are designed to ensure that the facility emissions of each individual HAP and total combined HAPs remain below the Title V thresholds.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).
2. The permittee shall calculate and record the following daily information each week for each coating line:
 - a. the total OC emissions from all coatings employed, in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);
 - b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and
 - c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.
3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divide by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for emissions units K001 through K010:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (for each HAP, the sum of b times d for each coating and the sum of f times h for each cleanup material, divided by 2000 lbs/ton); and
 - j. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material, divided by 2000 lbs/ton).

A listing of each HAP can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 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 maximum daily coating and thinning solvent 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.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the daily OC emissions exceeded 55.4 lbs/day, and the actual daily OC emissions for each such day.
3. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from this emissions unit, total individual HAP emissions in tons per year for each HAP from emissions units K001 through K010, and the total combined HAPs emissions in tons per year from emissions units K001 through K010 for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 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:

55.4 lbs/day of OC
10.6 tpy of OC

Applicable Compliance Method:

Record keeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for emissions units K007 through K010. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant: n-butyl alcohol

TLV (mg/m3): 112

Maximum Hourly Emission Rate (lbs/hr): 1.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2395.0

MAGLC (ug/m3): 2667.2

Pollutant: 2-butoxy-ethanol

TLV (mg/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 958.0

MAGLC (ug/m3): 2881.0

Pollutant: ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.2 for K007-K010

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2874.0

MAGLC (ug/m3): 10333.3

Pollutant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 0.4 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 958.0

MAGLC (ug/m3): 1238.1

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.6 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3832.0

MAGLC (ug/m3): 4476.2

Pollutant: trimethyl benzene (CAS 25551-13-7)

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 0.8 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1916.0

MAGLC (ug/m3): 2928.6

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.0 for K007-K010

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4790.0

MAGLC (ug/m3): 10333.3

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.