

Facility ID: 1667030018 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit K001](#)
[Go to Part II for Emissions Unit K002](#)
[Go to Part II for Emissions Unit P001](#)

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Facility ID: 1667030018 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Two electrostatic spray booths in dry type filter booths followed by curing oven	OAC rule 3745-31-05(A)(3) (PTI 16-1864)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-07(B) and 3745-21-09(U). 26.88 lbs/hr volatile organic compounds (VOC) 60.48 tpy VOC 3.21 lbs/hr particulate emission (PE) 14.06 tpy PE Combined annual coatings input usage rates* and combined annual emissions from emissions units (K001 & K002) shall not exceed the following, as rolling, 12-month summations: 95.0 tpy VOC*; 24.0 tpy combined hazardous air pollutants (HAPs); and 9.0 tpy individual HAP. See A.2.a and B.1 below. *Annual VOC input rates are equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted. Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule. See A.2.b below.
	OAC rule 3745-35-07(B) (Synthetic Minor to Avoid Title V permitting and MACT)	
	OAC rule 3745-17-07(A)(1)	3.0 lbs VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-21-09(U)(1)(i)	

2. **Additional Terms and Conditions**

- (a) The annual coatings usage input rates and annual emissions from emissions units K001 and K002, combined, shall not exceed the following, as rolling, 12-month summations:

- i. 95.0 tons of VOC;
- ii. 24.0 tons of combined HAP; and
- iii. 9.0 tons of any individual HAP.

The PE emission limitation specified in this applicable rule is less stringent than the PE emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The permittee shall employ the exhaust filter(s) when this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the spray booth:

- a. the company identification of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating (in pounds per gallon of coating excluding water and exempt solvents, and in pounds/gallon) and cleanup material, in pounds per gallon;
- d. the number of hours the emissions unit was in operation;
- e. the total VOC emission rate for all of the coatings and cleanup materials, in pounds per day; and
- f. the average hourly VOC emission rate [(e) divided by (d)], in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001 & K002, combined:

- a. the name and identification number of each coating, as applied;
- b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
- c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
- d. 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 (c)];
- e. the number of gallons of each coating employed;
- f. the name and identification of each cleanup material employed;
- g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- h. 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 (g)];
- i. the number of gallons of each cleanup material employed;
- j. the total individual HAP emissions from all coatings and cleanup materials employed, in tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials divided by 2000];
- k. the total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials divided by 2000];
- l. the total VOC emissions from all coatings and cleanup materials employed, in tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (f) times (i) for all of the cleanup materials divided by 2000];
- m. for the first 12 months of operation following issuance of this permit, the monthly cumulative total VOC emissions from all the coatings and cleanup materials employed, in tons;
- n. for the first 12 months of operation following issuance of this permit, the monthly cumulative total individual HAP emissions from all the coatings and cleanup materials employed, in tons;
- o. for the first 12 months of operation following issuance of this permit, the monthly cumulative total combined HAP emissions from all the coatings and cleanup materials employed, in tons;
- p. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in tons;
- q. the rolling, 12-month individual HAP emissions from all the coatings and cleanup materials employed, in tons; and
- r. the rolling, 12-month total combined HAPs emissions from all the coatings and cleanup materials employed, in tons.

3. The permit to install for this emissions unit was evaluated based on the actual materials and the design

parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-butoxyethanol

TLV (mg/m3): 2881

Maximum Hourly Emission Rate (lbs/hr): 52.38

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 99.42

MAGLC (ug/m3): 2881

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. The permittee shall document whether or not the exhaust filter(s) was/were in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs, of 95.0 tons, 9.0 tons, and 24.0 tons, respectively (for the entire facility.)
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly mass emission limitation for VOC of 26.88 pounds, and the actual VOC emissions for each such hour.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the cumulative monthly emission limitations for VOCs, individual HAP, and combined HAPs.
4. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.
5. The permittee shall submit annual reports that specify the VOC, total HAPs, and individual HAP emissions, in tons, for emissions unit K001 and K002 for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.
6. The permittee shall notify the Director (the Akron RAQMD) in writing of any record showing that the exhaust filter (s) was/were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days after the event occurs.
7. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
25.5 lbs/hr of VOC
Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the record keeping requirements specified in section II.C.1 of this permit.
If required, compliance shall be determined in accordance with Test Methods 1-4 and 25 and/or 18 as set forth in "Appendix on Test Methods" in 40 CFR Part 60, Standards of Performance for New Stationary Sources, as such Appendix existed on July 1, 2002.
Emission Limitation:
60.48 tpy of VOC
Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be demonstrated based upon the record keeping requirements specified in section II.C.1 of this permit, and shall be the summation of the daily VOC emission for the 365 days.
Emission Limitations:
3.21 lbs/hr PE
14.06 tpy PE
Applicable Compliance Method:
To determine the actual worst case emission rate for particulate emissions, the following equation may be used:
$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$
where:
E = particulate matter emissions rate (lb/hr);
TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and
CE = control efficiency of the dry exhaust filtration system.
If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
As long as compliance with the hourly allowable PE limitation is maintained, compliance with the annual allowable PE limitation shall be demonstrated (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).
Emission Limitations:
95.0 tpy VOC (for the entire facility)
24.0 tpy of total combined HAP (for the entire facility)
9.0 tpy of any individual HAP (for the entire facility)
commutative monthly VOC, individual HAP and combined HAP limitations (for the entire facility)
Applicable Compliance Method:
Compliance with the annual and monthly cumulative allowable emission limitations above shall be demonstrated based upon the record keeping requirements specified in section II.C.2 of this permit.
Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.
Applicable Compliance Method:
Compliance with the visible PE limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).
Emission Limitation:
3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.
Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation based on the record keeping requirements specified in section II.C.1 of this permit.
USEPA Method 24 or manufacturers formulation data shall be used to determine the VOC contents for coatings.
- F. Miscellaneous Requirements**
1. In accordance with OAC rule 3745-35-07(B), the following terms and conditions of this permit are federally enforceable: II.A.1, II.A.2, II.B.1, II.C.1, II.C.2, II.C.6, II.D.1, II.D.2, II.D.3, II.D.4, II.D.5, II.D.6, II.D.7, and II.E.1.

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

Facility ID: 1667030018 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Flow coat painting system with natural gas fired burner followed by curing oven	OAC rule 3745-31-05(A)(3) (PTI 16-1864)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-07(B) and 3745-21-09(U). 25.5 lbs/hr volatile organic compounds (VOC) 57.38 tpy VOC
	OAC rule 3745-31-07(B) (Synthetic Minor to Avoid Title V permitting and MACT)	Combined annual coatings input usage rates* and combined annual emissions from emissions units (K001 & K002) shall not exceed the following, as rolling, 12-month summations: 95.0 tpy VOC*; 24.0 tpy combined hazardous air pollutants (HAP); and 9.0 tpy individual HAP. See A.2.a and B.1 below. *Annual VOC input rates are equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted. 3.0 lbs VOC per gallon of coating, excluding water and exempt solvents

OAC rule 3745-21-09(U)(1)(i)

2. **Additional Terms and Conditions**
 - (a) The annual coatings usage input rates and annual emissions from emissions units K001 and K002, combined, shall not exceed the following, as rolling, 12-month summations:
 - i. 95.0 tons of VOC;
 - ii. 24.0 tons of combined HAP; and
 - iii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall operate this emissions unit with all the exhaust baffles installed.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the spray booth:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

- c. the VOC content of each coating (in pounds per gallon of coating excluding water and exempt solvents, and in pounds/gallon) and cleanup material, in pounds per gallon;
- d. the number of hours the emissions unit was in operation;
- e. the total VOC emission rate for all of the coatings and cleanup materials, in pounds per day; and
- f. the average hourly VOC emission rate [(e) divided by (d)], in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001 & K002, combined:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
 - c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. 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 (c)];
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - h. 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 (g)];
 - i. the number of gallons of each cleanup material employed;
 - j. the total individual HAP emissions from all coatings and cleanup materials employed, in tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials divided by 2000];
 - k. the total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials divided by 2000];
 - l. the total VOC emissions from all coatings and cleanup materials employed, in tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials divided by 2000];
 - m. for the first 12 months of operation following issuance of this permit, the monthly cumulative total VOC emissions from all the coatings and cleanup materials employed, in tons;
 - n. for the first 12 months of operation following issuance of this permit, the monthly cumulative total individual HAP emissions from all the coatings and cleanup materials employed, in tons;
 - o. for the first 12 months of operation following issuance of this permit, the monthly cumulative total combined HAP emissions from all the coatings and cleanup materials employed, in tons;
 - p. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in tons;
 - q. the rolling, 12-month individual HAP emissions from all the coatings and cleanup materials employed, in tons; and
 - r. the rolling, 12-month total combined HAPs emissions from all the coatings and cleanup materials employed, in tons.

- 3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-butoxyethanol

TLV (mg/m3): 2881

Maximum Hourly Emission Rate (lbs/hr): 52.38

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 99.42

MAGLC (ug/m3): 2881

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. The permittee shall document whether or not the exhaust baffles were in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs, of 95.0 tons, 9.0 tons, and 24.0 tons, respectively (for the entire facility.)
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly mass emission limitation for VOC of 25.5 pounds, and the actual VOC emissions for each such hour.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the cumulative monthly emission limitations for VOCs, individual HAP, and combined HAPs.
4. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.
5. The permittee shall submit annual reports that specify the VOC, total HAPs, and individual HAP emissions, in tons, for emissions unit K001 and K002 for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.
6. The permittee shall notify the Director (the Akron RAQMD) in writing of any record showing that the exhaust filter (s) was/were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days after the event occurs.
7. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

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

Emission Limitation:

25.5 lbs/hr of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the record keeping requirements specified in section II.C.1 of this permit.

If required, compliance shall be determined in accordance with Test Methods 1-4 and 25 and/or 18 as set forth in "Appendix on Test Methods" in 40 CFR Part 60, Standards of Performance for New Stationary Sources, as such Appendix existed on July 1, 2002.

Emission Limitation:

57.38 tpy of VOC

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be demonstrated based upon the record keeping requirements specified in section II.C.1 of this permit, and shall be the summation of the daily VOC emission for the 365 days.

Emission Limitations:

- 95.0 tpy VOC (for the entire facility)
- 24.0 tpy of total combined HAP (for the entire facility)
- 9.0 tpy of any individual HAP (for the entire facility)

commutative monthly VOC, individual HAP and combined HAP limitations (for the entire facility)

Applicable Compliance Method:

Compliance with the annual and monthly cumulative allowable emission limitations above shall be demonstrated based upon the record keeping requirements specified in section II.C.2 of this permit.

Emission Limitation:

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitation based on the record keeping requirements specified in section II.C.1 of this permit.

USEPA Method 24 or manufacturers formulation data shall be used to determine the VOC contents for coatings.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07(B), the following terms and conditions of this permit are federally enforceable: II.A.1, II.A.2, II.B.1, II.C.1, II.C.2, II.C.6, II.D.1, II.D.2, II.D.3, II.D.4, II.D.5, II.D.6, II.D.7, and II.E.1.

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Facility ID: 1667030018 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-Stage Iron Phosphate frame and door wash system	OAC rule 3745-31-05(A)(3) (PTI 16-972)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1). 0.551 lbs/hr particulate emission (PE) 2.41 tpy PE
	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	
	OAC rule 3745-17-11(B)(1)	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average See A.2.a below.

2. Additional Terms and Conditions

- (a) The emission limitation specified in this applicable rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual reports which (a) identify all days during which any visible fugitive particulate emissions were observed in excess of the allowable opacity limit specified above from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

0.551 lb/hr of particulates

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Methods1-5 as set forth in "Appendix on Test Methods" in 40 CFR Part 60, Standards of Performance for New Stationary Sources, as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

Emission Limitation:

2.41 tpy PE

Applicable Compliance Method:

As long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation can be assumed (the annual limitation can be calculated by summing the hourly PE emission rates in for 8760 calendar hours per year and then dividing by 2000 lbs/ton to convert to tons.)

Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

Emission Limitation:

Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method:

Compliance with the visible PE limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

1. In accordance with OAC rule 3745-35-07(B), all of the terms and conditions of this permit are federally enforceable.