

Facility ID: 1667040087 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 1667040087 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>
miscellaneous metal parts coating line - equipment includes the following: Pre-Heat Oven (natural gas-fired, 400,000 Btu/hr heat input); Varnish Mix Tank (190 gallon capacity, closed to ambient air); Varnish Reservoir Tank (190 gallon capacity, closed to ambient air); Varnish Dip Tank (20 gallon capacity, overflow to Varnish Reservoir Tank); Curing Oven (natural gas-fired, 400,000 Btu/hr heat input); and Ambient Air Cooler.	OAC rule 3745-31-05 (PTI 16-1981)	2.3 lbs/hr and 10 tpy of volatile organic compounds (VOCs)
	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds of VOCs per gallon of coating, excluding water and exempt solvents (monthly volume-weighted average) [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09]

2. **Additional Terms and Conditions**
 - (a) The above hourly and yearly VOC emission limits (regulated under OAC rule 3745-31-05) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

B. Operational Restrictions

1. The permittee shall only use natural gas as fuel for the pre-heat and curing ovens.
2. The permittee shall use only water for cleanup, and thinning or reducing of coating formulations.

C. Monitoring and/or Record Keeping Requirements

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

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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 Limitations: 2.3 lbs/hr and 10 tpy of VOCs

Applicable Compliance Method: The VOC emissions limitations are based upon the emission unit's potential to emit:

$$\begin{aligned} \text{PTE[VOC]h} &= (\text{CARCmax}) \times (\text{VOCCmax}); \text{ and} \\ \text{PTE[VOC]y} &= (\text{PTE[VOC]h}) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

PTE[VOC]h = 2.3 pounds of VOCs/hour [hourly potential to emit VOCs];

PTE[VOC]y = 10 tons of VOCs/year [yearly potential to emit VOCs];

CARCmax = 0.85 gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

VOCCmax = 2.7 pounds of VOCs/gallon of coating [maximum VOC content of coatings as applied after any thinning].

Emission Limitation: 3.0 pounds of VOCs per gallon of coating, excluding water and exempt solvents (monthly volume-weighted average) [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09]

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.