

Facility ID: 1677000245 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: 1677000245 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>
Down draft automotive spray paint booth no. 1 with air makeup unit and fabric filter	OAC rule 3745-31-05 See F.1 below.	36 lbs/day of volatile organic compounds (VOC) 1% opacity as a 6-minute average
	OAC rule 3745-17-07 See F.1 below.	See A.2.a below.
	OAC rule 3745-17-11 See F.1 below.	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U) See F.1 below.	See B.1 below.

2. Additional Terms and Conditions

- (a) The emission limitation based on this rule is less stringent than the emission limitation as determined using best available technology.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for the coating line on a daily basis:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating and cleanup material employed; and
 - c. the total daily volume, in gallons per day, of all of the coatings employed.

[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 for the coating line on a monthly basis:
 - a. the volatile organic compound (VOC) content of each coating and cleanup material, in pounds per gallon;
 - b. the total number of days the emissions unit was in operation; and
 - c. the monthly and average daily VOC emission rate for all coatings and cleanup materials, in pounds.

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

D. Reporting Requirements

1. The permittee shall 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 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 deviation (excursion) reports which include an identification of each month during which the average daily total VOC emissions exceeded 36.0 pounds per day, and the actual average daily VOC emissions for each such month. These deviation reports shall be submitted in accordance with the requirements of General Term and Condition #3.

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:

36.0 lbs/day of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of section C of these T&Cs.

U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for each coating employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the STAPPA & ALAPCO derived particulate emission factor of 0.206 lb per gallon of coating employed by the maximum number of gallons of coatings employed per hour.

Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1744, as issued on December 23, 1997: A, B, C, D, E, and F.

2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the n-butyl acetate, iron oxide, titanium dioxide, barium sulfate, 1-methoxy-2-propyl acetate, toluene, xylene, MEK, and methyl n-amyl ketone emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of 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 acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34

MAGLC (ug/m3): 16,976

Pollutant: iron oxide

TLV (mg/m3): 5

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34

MAGLC (ug/m3): 119

Pollutant: titanium dioxide

TLV (mg/m3): 10

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34

MAGLC (ug/m3): 238

Pollutant: barium sulfate

TLV (mg/m3): 10

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34

MAGLC (ug/m3): 238

Pollutant: 1-methoxy-2-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34

MAGLC (ug/m3): 19,881

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 0.25
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34
MAGLC (ug/m3): 188
Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.25
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34
MAGLC (ug/m3): 10,333
Pollutant: MEK

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 0.25
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34
MAGLC (ug/m3): 14,047
Pollutant: methyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 0.25
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 33.34
MAGLC (ug/m3): 5,547

3. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:
- Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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.
 - Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
 - Any change to the emissions unit or its method of operation that would either 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.
 - Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).