Facility ID: 1677010157 Issuance type: Draft 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

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Electrodeposition tank coating miscellaneous metal parts with bake oven	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)
	OAC rule 3745-17-07	Visible particulate emissions from the oven stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule 0.020 pound of particulates per million Btu of actual heat input
	OAC rule 3745-17-10	See A.2.a and A.2.b below.
	OAC rule 3745-35-07	

2. **Additional Terms and Conditions**

   (a) The emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

   Month(s) Maximum Allowable Cumulative Emissions of VOC (Tons)

   1 2.1
   1-2 4.2
   1-3 6.2
   1-4 8.3
   1-5 10.4
   1-6 12.4
   1-7 14.5
   1-8 16.6
   1-9 18.7
   1-10 20.8
   1-11 22.8
   1-12 24.9

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.
   The emissions of individual hazardous air pollutants (HAP) from this emissions unit shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of Individual HAP (Tons)

1 0.8
1-2 1.6
1-3 2.5
1-4 3.3
1-5 4.1
1-6 5.0
1-7 5.8
1-8 6.6
1-9 7.4
1-10 8.2
1-11 9.1
1-12 9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual individual HAP emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

Note:
annual emissions of combined HAP will automatically be limited to 24.9 tons per year, since each HAP emitted from this emissions unit is also a VOC.

B. **Operational Restrictions**

1. The permittee shall use only natural gas as fuel for the bake oven associated with this emissions unit.

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

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

   c. the daily 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.

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

   a. the name and identification number of each material added to the deposition tank;

   b. the VOC content, in pounds per gallon, of each material added to the deposition tank;

   c. the individual HAP content for each individual HAP, in pounds per gallon, of each material added to the deposition tank;

   d. the number of gallons of each material added to the deposition tank;

   e. the total VOC emissions from all materials added to the deposition tank, in tons;

   f. the total individual HAP emissions for each individual HAP from all materials added to the deposition tank, in tons;

   g. during the first 12 calender months of operation following the issuance of this permit, the cumulative emissions of VOC, in tons;

   h. after the first 12 calender months of operation following the issuance of this permit, the rolling, 12-month summation of the emissions of VOC, in tons;

   i. during the first 12 calender months of operation following the issuance of this permit, the cumulative emissions of each individual HAP, in tons; and

   j. after the first 12 calender months of operation following the issuance of this permit, the rolling, 12-month summation of the emissions of each individual HAP, in tons.

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 daily volume-weighted average VOC content exceeds the applicable limitation. 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 identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
   Emission Limitation:

   3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average),

for an extreme performance coating.

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.
Emission Limitation:

0.020 pound of particulates per million Btu of actual heat input

Applicable Compliance Method:

If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(9).
Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
Emission Limitation:

24.9 tons per year of VOC, based upon a rolling, 12-month summation of the monthly emissions and, for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative emissions of VOC, as shown in the table in Section A.2.a above.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2 above.
Emission Limitation:

9.9 tons per year of any individual HAP, based upon a rolling, 12-month summation of the monthly emissions and, for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative emissions of any individual HAP, as shown in the table in Section A.2.b above.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2 above.

F. **Miscellaneous Requirements**

1. By request of the permittee and pursuant to OAC rule 3745-35-07, the special terms and conditions of this permit are federally enforceable requirements.

2. The permittee is hereby notified that this permit and all agency records concerning the pemitted emissions unit are subject to public disclosure in accordance with OAC 3745-49-03.

3. This permit allows the use of the coatings specified by the permittee in the FESOP (federally enforceable state operating permit) application. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating 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 glycol ether 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 glycol ether:

   Pollutant: glycol ether

   TWA (mg/m3): 18
   Maximum Average Hourly Emission Rate (lbs/hr): 5.6
   Predicted 1-Hour Maximum Ground-Level Concentration at 82 m (mg/m3): 0.27
   MAGLC (mg/m3): 0.43

4. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

   a. any changes in the composition of the coatings, or the use of new coatings, that would result in the emission of a compound with a lower TWA threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;

   b. 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);

   c. any change in the composition of the coatings, or use of new coatings, 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)]; and

   d. any change in the composition of the coatings, or use of new coatings, that would result in an increase in

emissions of any HAPS as defined in OAC rule 3745-77-01(V).

For 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, the permittee shall obtain a permit to install prior to the change.