Facility ID: 1677010316 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.

Go to Part II for Emissions Unit K001
Go to Part II for Emissions Unit P003

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Facility ID: 1677010316 Emissions Unit ID: K001 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Grayco & Boss Low Pressure Airless Painting Systems; Air Dry	OAC rule 3745-35-07(B) (Synthetic Minor to Avoid Title V permitting)	The annual emissions from the entire facility shall not exceed the following (as rolling, 12-month summations): 24.9 tons/yr combined hazardous air pollutants (HAP); and 9.9 tons/yr individual HAP. See A.2.a below.
	OAC rule 3745-21-09 (U)(1)(c)	The VOC content of any extreme performance coating [as defined in OAC rule 3745-21-01(D)(19)] applied to a metal surface shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(U)(1)(i)	The VOC content of any other coating applied to a metal surface shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-17-07(A)(1)	Visible particulate emission (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.551 pound per hour.

2. **Additional Terms and Conditions**

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

   i. 24.9 tons of all HAPs, combined; and
   ii. 9.9 tons of any individual HAP.

B. **Operational Restrictions**

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (tons)
1	0.9	2.25

1-2 1.8 4.50
1-3 2.7 6.75
1-4 3.6 9.00
1-5 4.5 11.25
1-6 5.4 13.50
1-7 6.3 15.75
1-8 7.2 18.00
1-9 8.1 20.25
1-10 9.0 22.50
1-11 9.9 24.75
1-12 9.9 24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations.

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

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in the entire facility:

a. the company identification and type (i.e., extreme performance, or other) of each coating and cleanup material employed;

b. the VOC content of each coating (in pounds per gallon, excluding water and exempt solvents and in pounds per gallon of coating) and cleanup material, in pounds per gallon;

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 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 (g)];

h. the number of gallons of each cleanup material employed;

i. the total individual HAP emissions from all the 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];

j. the total combined HAP emissions from all the 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];

2. k. beginning the first month after the first 12 months of operation following the issuance of this permit, the rolling, 12-month individual HAP emissions from all the coatings and cleanup materials employed, in tons [the sum of (j) for the previous 12 calendar months];

l. beginning the first month after the first 12 months of operation following the issuance of this permit, the rolling, 12-month total combined HAPs emissions from all the coatings and cleanup materials employed, in tons [the sum of (k) for the previous 12 calendar months]; and

m. for the first 12 months of operation following the issuance of this permit, the cumulative individual HAP and combined HAPs emissions, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month emission limitations for for each individual HAP and for the combined HAPs of 9.9 tons and 24.9 tons, respectively (for the entire facility); and

b. all exceedances of the monthly cumulative individual HAP and combined HAPs emission limitations.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

2. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use any noncomplying coating (i.e., for VOC content). 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.

3. The permittee shall submit annual reports that summarize the combined HAPs, and individual HAP emissions, in tons, for the surface coating line. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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:

24.9 tons/yr of total combined HAPs (for the entire facility)

9.9 tons/yr of any individual HAP (for the entire facility)

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated based upon the record keeping requirements specified in section C.1 of this permit.
Emission Limitations:

The VOC content of any extreme performance coating [as defined in OAC rule 3745-21-01(D)(19)] applied to a metal surface shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of any other coating applied to a metal surface shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitations above shall be demonstrated based upon the record keeping requirements specified in section II.C.1of this permit.
Emission Limitation:

PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation may be used:

E = maximum coating solids usage rate (in pounds per hour) X (1-TE) X (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.
Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

2. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 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 or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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.

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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
Wheelabrator steel shot blaster No. A125517, controlled with a model 112-D baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	PE shall not exceed 10.4 pounds per hour.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The baghouse and associated control equipment serving this emissions unit shall be employed all times the emissions unit is in operation.

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

1. The permittee shall document all times the baghouse and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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 minimize or eliminate the 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.

D. **Reporting Requirements**

1. The permittee shall notify the Director (the Akron RAQMD) in writing of any record in which the baghouse and/or associated control equipment serving this emissions unit was 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 appropriate District Office or local air agency) within 30 days after the event occurs.

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 minimize or 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.I.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

PE shall not exceed 10.4 pounds per hour.

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation:

PE, in lbs/hr = (10 lbs PE/2,000 lbs Steel Shot*) x (8 blasting wheels) x (400 lbs steel shot blasted per wheel per hour) x (100% - 99% Estimated Control Efficiency) = 0.16 lbs/hr PE

*Emission factor for uncontrolled steel shot blasting published by San Diego Air Pollution Control District.

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

F. **Miscellaneous Requirements**

1. None