

Facility ID: 1677010984 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.

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Facility ID: 1677010984 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>
Paint spray booth for coating metal file tiers	OAC rule 3745-31-05 See F.1 below.	1.3 lbs/hr of 2-butoxyethanol 0.2 lb/hr of n-butanol
	OAC rule 3745-17-07 See F.1 below.	20% opacity as a 6-minute average, except as provided by rule
	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.	3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

- (a) The permittee shall operate and maintain filter elements with a minimum overall particulate control efficiency of 95% in accordance with the manufacturer's recommendations, instructions, and operating manual(s).  
The 2-butoxyethanol and n-butanol pound per hour emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and, as such, represent maximum hourly emission rates. Therefore, it is not necessary to develop recordkeeping and reporting requirements to ensure compliance with these emission limitations. Should changes occur pursuant to Section F.3 of this permit, these maximum hourly emission rates may require modification.

**B. Operational Restrictions**

1. The permittee shall employ only water as the cleanup material with this emissions unit.

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

1. The permittee shall collect and record the following information each month for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in pounds of VOC per gallon of coating.

**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 Limitation:  
3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

## Applicable Compliance Method:

USEPA Method 24 shall be used to determine the VOC contents for all coating formulas used with this emissions unit. 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. Note: if any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee must either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier.

## Emission Limitations:

1.3 lbs/hr of 2-butoxyethanol  
0.2 lb/hr n-butanol

## Applicable Compliance Method:

Compliance has been demonstrated using the coating formulation data and the design parameters of the emission unit's exhaust system in accordance with the procedures established by Ohio EPA's "Air Toxics Policy".

## Emission Limitation:

0.551 lb/hr of particulate matter

## Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the procedures and methods as specified in 40 CFR Part 60, Appendix A, Method 5.

## Emission Limitation:

20% opacity as a 6-minute average

## Applicable Compliance Method:

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

**F. Miscellaneous Requirements**

- The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1660, as issued on July 16, 1997: A, B, C, D, E, and F.
- This permit allows the use of the coatings 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-butanol, and 2-butoxyethanol 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 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: 2-butoxyethanol

TLV (mg/m3): 121  
Maximum Hourly Emission Rate (lbs/hr): 1.3  
Predicted 1 Hour Maximum Ground-Level Concentration (mg/m3): 0.047  
MAGLC (mg/m3): 2.9

Pollutant: n-butanol

TLV (mg/m3): 122  
Maximum Hourly Emission Rate (lb/hr): 0.23  
Predicted 1 Hour Maximum Ground-Level Concentration (mg/m3): 0.0084  
MAGLC (mg/m3): 2.9

- 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 the use of new coatings, 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.
  - A reduction in the TLV by the ACGIH for any of the coatings, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.
  - 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 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)].
  - Any change in the composition of the coatings or use of new coatings, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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Facility ID: 1677010984 Emissions Unit ID: K002 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>
Paint spray booth for coating metal file tier rails	OAC rule 3745-31-05 See F.1 below.	0.4 lb/hr of ethylene glycol 0.3 lb/hr of dibutylphthalate 0.5 lb/hr of 2-butoxyethanol
	OAC rule 3745-17-07 See F.1 below.	20% opacity as a 6-minute average, except as provided by rule
	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.	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

- (a) The permittee shall operate and maintain filter elements with a minimum overall particulate control efficiency of 85% in accordance with the manufacturer's recommendations, instructions, and operating manual(s).  
The ethylene glycol, dibutylphthalate, and 2-butoxyethanol pound per hour emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and, as such, represent maximum hourly emission rates. Therefore, it is not necessary to develop recordkeeping and reporting requirements to ensure compliance with these emission limitations. Should changes occur pursuant to Section F.3 of this permit, these maximum hourly emission rates may require modification.

**B. Operational Restrictions**

1. The permittee shall employ only water as the cleanup material with this emissions unit.

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

1. The permittee shall collect and record the following information each month for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in pounds of VOC per gallon of coating.

**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 Limitation:  
  
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method:  
  
USEPA Method 24 shall be used to determine the VOC contents for all coating formulas used with this emissions unit. 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. Note: if any such coating has not been analyzed using Method 24 since January 1, 1991, the permittee must either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier.

Emission Limitations:

0.5 lb/hr of 2-butoxyethanol  
0.4 lb/hr of ethylene glycol  
0.3 lb/hr of dibutylphthalate

Applicable Compliance Method:

Compliance has been demonstrated using the coating formulation data and the design parameters of the emissions unit's exhaust system in accordance with the procedures established by Ohio EPA's "Air Toxics Policy".

Emission Limitation:

0.551 lb/hr particulates

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the procedures and methods as specified in 40 CFR Part 60, Appendix A, Method 5.

Emission Limitation:

20% 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 16-1660, as issued on July 16, 1997: A, B, C, D, E, and F.

2. This permit allows the use of the coatings 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 ethylene glycol, 2-butoxyethanol, and dibutylphthalate 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 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: 2-butoxyethanol

TLV (mg/m3): 121  
Maximum Hourly Emission Rate (lbs/hr): 0.54  
Predicted 1 Hour Maximum Ground-Level Concentration (mg/m3): 0.027  
MAGLC (mg/m3): 2.9

Pollutant: dibutylphthalate

TLV (mg/m3): 5  
Maximum Hourly Emission Rate (lbs/hr): 0.29  
Predicted 1 Hour Maximum Ground-Level Concentration (mg/m3): 0.017  
MAGLC (mg/m3): 0.12

Pollutant: ethylene glycol

TLV (mg/m3): 127  
Maximum Hourly Emission Rate (lbs/hr): 0.37  
Predicted 1 Hour Maximum Ground-Level Concentration (mg/m3): 0.019  
MAGLC (mg/m3): 3.0

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 the use of new coatings, 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.
- A reduction in the TLV by the ACGIH for any of the coatings, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.
- 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 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)].
- Any change in the composition of the coatings or use of new coatings, that would result in an increase in

emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).