

Facility ID: 1677010984 Issuance type: Final State Permit To Operate

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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: 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>
Conveyorized painting line, including manual spray paint booths, natural gas drying ovens.	OAC 3745-31-05(A)(3) 16-1660 (Issued 07/16/1997) 16-642 (Issued 02/03/1988)	<p>Volatile organic compound (VOC) emissions shall not exceed 4.90 pounds per hour as a daily average from coatings, and 21.46 tons per year from both coatings and cleanup materials.</p> <p>2-butoxyethanol emissions shall not exceed 1.3 pounds per hour as a daily average from coatings, and 5.69 tons per year.</p> <p>n-butanol emissions shall not exceed 0.2 pounds per hour as a daily average from coatings, and 0.88 tons per year.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-17-11(B)(1) and OAC rule 3745-17-07(A)(1).</p>
	OAC rule 3745-21-09(U)(1) OAC rule 3745-17-07(A)	See 2.a. below Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pounds per hour and 2.4 tons per year from coatings.

2. **Additional Terms and Conditions**
 - (a) The VOC content of the metal coatings employed shall not exceed a daily volume-weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.
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 operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.
2. 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 maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the coating line:

- a. The name and identification number of each coating employed.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed].
 - e. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC₂.
 - f. The total number of hours this emissions unit was in operation.
 - g. The average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (f)].
 Note: If the VOC content of each of the coatings employed during a day is less than 3.0 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.
3. The permittee shall collect and record the following information for each month for this emissions unit:
- a. The company identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions rate from all the cleanup materials employed, in pounds [i.e., sum of (b) x (c) for each cleanup material employed].
 - e. The amount of cleanup material recovered, in pounds.
 - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
4. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in Section A.III.2 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section A.III.3].

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.0 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record that identifies each day the VOC emissions exceeded the average hourly emissions limit specified above.

The quarterly deviations reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 Emissions Limitation:
 daily volume-weighted average of 3.0 lbs VOC per gallon, as applied, excluding water and exempt solvents.

 Applicable Compliance Method:
 Compliance shall be based upon the record keeping specified in Section A.III
 Emissions Limitation:
 4.90 lbs/hr of VOC emissions, as a daily average

 Applicable Compliance Method:
 Compliance shall be based upon the record keeping specified in Section A.III.2.
 Emissions Limitation:
 21.46 TPY of VOC emissions

 Applicable Compliance Method:
 Compliance shall be based upon the record keeping specified in Section A.III.4.
 Emission Limitation:
 0.551 lb of PE per hour

 Applicable Compliance Method:
 To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$
 where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation:

2.41 tons of PE per year

Applicable Compliance Method:

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit assuming the source operated 8760 hours per year.

Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation 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.

2. 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. None