

Facility ID: 1677010986 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.

[Go to Part II for Emissions Unit K002](#)

[Go to Part II for Emissions Unit K003](#)

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Facility ID: 1677010986 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>
East spray booth #1, vinyl coating process	OAC rule 3745-31-05 (PTI 16-1725)	2.5 lbs/hr of volatile organic compounds (VOC)
	OAC rule 3745-21-09(H)	4.8 pounds of VOC per gallon of coating employed
	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter

2. **Additional Terms and Conditions**
 - (a) The permittee shall operate and maintain a fabric filter in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the company identification for each coating and cleanup material, as applied;
 - b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - d. 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;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

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 include an identification of each day during which the average hourly VOC emissions exceeded 2.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

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:

2.5 lbs/hr of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed. USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

4.8 pounds of VOC per gallon of coating

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating employed and the calculated daily volume-weighted average VOC content of all coatings, as applied. USEPA Method 24 shall be used to determine the VOC content of each coating.

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

Multiply the maximum hourly coating usage rate, in gallons per hour, by the STAPPA derived particulate emission factor of 0.206 pound per gallon.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1725. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene and acetone emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (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 Screen 3 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: Toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 2.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 122.3

MAGLC (ug/m3): 4,476

Pollutant: Acetone

TLV (ug/m3): 1,780

Maximum Hourly Emission Rate (lbs/hr): 2.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 122.3

MAGLC (ug/m3): 42,380

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 modifications to PTI 16-1725 and the operating permit:

a. 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;

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) that would result in an exceedance of any MAGLC specified in the above table;

c. a reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;

d. 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;

e. 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)]; and

- f. 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).

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Facility ID: 1677010986 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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 - (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>
East spray booth #2, vinyl coating process	OAC rule 3745-31-05 (PTI 16-1725)	2.5 lbs/hr of volatile organic compounds (VOC)
	OAC rule 3745-21-09(H)	4.8 pounds of VOC per gallon of coating employed
	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter

- 2. **Additional Terms and Conditions**
 - (a) The permittee shall operate and maintain a fabric filter in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for the line:
 - a. the company identification for each coating and cleanup material, as applied;
 - b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - d. 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 CVOC₂;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

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 include an identification of each day during which the average hourly VOC emissions exceeded 2.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

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:

2.5 lbs/hr of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed. USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

4.8 pounds of VOC per gallon of coating

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating employed and the calculated daily volume-weighted average VOC content of all coatings, as applied. USEPA Method 24 shall be used to determine the VOC content of each coating.

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

Multiply the maximum hourly coating usage rate, in gallons per hour, by the STAPPA derived particulate emission factor of 0.206 pound per gallon.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1725. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene and acetone emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (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 Screen 3 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: Toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 2.5

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Maximum Hourly Emission Rate (lbs/hr): 2.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 122.3

MAGLC (ug/m3): 42,380

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 modifications to PTI 16-1725 and the operating permit:

a. 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;

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) that would result in an exceedance of any MAGLC specified in the above table;

c. a reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;

d. 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;

e. 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)]; and

- f. 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).