

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 K004](#)

[Go to Part II for Emissions Unit R001](#)

[Go to Part II for Emissions Unit R002](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677010986 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
metal parts coating spray booth with electric drying oven and fabric filter system	OAC rule 3745-31-05 (PTI 16-1747)	21.48 lbs/day of volatile organic compounds (VOC)
		visible emissions from this emissions unit shall not exceed 1% opacity as a 6-minute average
		see B.1, below
	OAC rule 3745-17-11	0.551 lb/hr of particulates (PM)
	OAC rule 3745-17-07	less stringent than the best available technology-based limitation above
	OAC rule 3745-21-09(U)	less stringent than the best available technology-based limitation above (see A.2.a)

2. **Additional Terms and Conditions**
 - (a) This emissions unit is exempt from the emission limitations of OAC rule 3745-21-09(U)(1) because, pursuant to OAC rule 3745-21-09(U)(2)(f) and the best available technology-based operating restriction in section B.1 of these terms and conditions, the maximum daily coating usage for this emissions unit shall not exceed 3.0 gallons.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 3.0 gallons, as applied.
2. The permittee shall operate the fabric filter systems whenever the emissions unit is in operation.

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 employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed; and
 - d. whether or not the fabric filter was in service during operation of the emissions unit.
2. The permittee shall collect and record the following information each month for the purpose of determining VOC emissions:
 - a. the name and identification of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating, as applied, in pounds per gallon;

- d. the VOC emissions of each coating employed, in pounds, i.e., (C.2.b)x(C.2.c) for each coating identified in section C.2.a;
- e. the total VOC emissions of the emissions unit, in pounds, i.e., the sum of (C.2.d) for all coatings identified in section C.2.a;
- f. the number of days the emissions unit was in operation; and
- g. the average daily VOC emissions, in pounds, i.e., (C.2.e)/(C.2.f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

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 applicable maximum daily coating usage limit was exceeded. 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 month during which the average daily VOC emissions exceeded 21.48 lbs/day, and the actual daily VOC emissions for each such month.
3. The permittee shall submit deviation (excursion) reports that identify all days during which the emissions unit was in operation but the fabric filter system was not in service.
4. These deviation (excursion) reports shall be submitted in accordance with Part I - General Term and Condition A.1.c.

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:

21.48 lbs/day of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating employed, the daily usage of each coating employed, and the calculated average daily VOC emission rates for all coatings employed in accordance with section C.2, above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents of each coating employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A can not 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 or 24A.

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = (M) \times (1 - TE) \times (1 - CE)$$

where

E = particulate matter emission rate (lbs/hr)

M = maximum coating solids usage rate (5.5 lbs/gal x 0.375 gal/hr = 2.1 lbs/hr)

TE = transfer efficiency of the coating equipment (0.45 for spray guns)

CE = control efficiency of air pollution control equipment (0.85 for the fabric filter)

If required, compliance shall be demonstrated through emissions testing using methods 1-5 of 40 CFR Part 60, Appendix A, and the procedures detailed in OAC rule 3745-17-03(B)(10).

Emission Limitation:

1% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations using method 9 of 40 CFR Part 60, Appendix A, and the procedures detailed in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677010986 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
line number 1, spray booth number 1 west (vinyl coating process controlled with fabric filter)	OAC rule 3745-31-05 (PTI 16-1795)	4.4 lbs/hr and 8.25 TPY of volatile organic compounds (VOC)
	OAC rule 3745-21-09(H)	2.4 TPY particulates
	OAC rule 3745-17-07	4.8 pounds of VOC per gallon of coating employed, excluding water and exempt solvents
	OAC rule 3745-17-11	20% opacity as a 6-minute average, except as provided by rule
		0.551 lb/hr of particulates

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. The permittee shall operate the fabric filter system whenever the emissions unit is in operation.

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 employed;
 - b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied, in pounds per gallon;
 - 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 daily, average-hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour, i.e., the sum of [(C.1.b)x(C.1.c)]/(C.1.e) for each coating and cleanup material identified in section C.1.a.

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 4.4 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 -

4.4 lbs/hr and 8.25 TPY 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 daily VOC emission rate for all

coatings and cleanup materials employed. Method 24 of 40 CFR Part 60, Appendix A, 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. Method 24 of 40 CFR Part 60, Appendix A, shall be used to determine the VOC content of each coating.

Emission Limitation -

0.551 lb/hr and 2.4 TPY of particulates

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.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1795. 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

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 by the appropriate Ohio EPA District Office or local air agency:

- 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 section;
- 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 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
- d. 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).

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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677010986 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
line number 1, spray booth number 2 west (vinyl coating process controlled with fabric filter)	OAC rule 3745-31-05 (PTI 16-1795)	4.4 lbs/hr and 8.25 TPY of volatile organic compounds (VOC)
		2.4 TPY particulates
	OAC rule 3745-21-09(H)	4.8 pounds of VOC per gallon of coating employed, excluding water and exempt solvents
	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 particulates

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. The permittee shall operate the fabric filter system whenever the emissions unit is in operation.

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 employed;
 - b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied, in pounds per gallon;
 - 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 daily, average-hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour, i.e., the sum of [(C.1.b)x(C.1.c)]/(C.1.e) for each coating and cleanup material identified in section C.1.a.

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 4.4 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 -
 - 4.4 lbs/hr and 8.25 TPY 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 daily VOC emission rate for all coatings and cleanup materials employed. Method 24 of 40 CFR Part 60, Appendix A, 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. Method 24 of 40 CFR Part 60, Appendix A, shall be used to determine the VOC content of each coating.

Emission Limitation -

0.551 lb/hr and 2.4 TPY of particulates

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.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1795. 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

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 by the appropriate Ohio EPA District Office or local air agency:

- 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 section;
- 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 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
- d. 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).

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.