

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.

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

Facility ID: 1677010986 Emissions Unit ID: K005 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 applying non-stick coatings to metal parts, controlled with polyester/paper filters | OAC rule 3745-31-05<br>(PTI 16-1763) | 15.2 lbs/day of organic compounds (OC)<br>2.76 tpy of OC<br>2.4 tpy of particulate emissions<br>See A.2.a, A.2.b, A.2.c, and B.1 below. |
|   |                                      | See A.2.d below.  |
|   | OAC rule 3745-17-07                  | 0.551 lb/hr of particulate emissions  |
|   | OAC rule 3745-17-11                  | See A.2.e below.  |
|   | OAC rule 3745-21-09(U)               |   |

**2. Additional Terms and Conditions**

- (a) Visible particulate emissions shall not exceed 1% opacity as a 6-minute average from this emissions unit.  
 The annual organic material limit is based on the potential to emit considering a 3.0 gallon per day paint usage limit, therefore no recordkeeping is required to demonstrate compliance with this limitation.  
 The annual particulate emissions limitation was based on the potential to emit of particulate emissions considering the coating usage limitation, and the overall control efficiency of the fabric filters.  
 The visible particulate emissions limitation required by OAC rule 3745-17-07 is less stringent than the visible particulate emissions limitation required by OAC rule 3745-31-05.  
 The coating usage restriction required by OAC rule 3745-21-09(U) is less stringent than the coating usage restriction required by OAC rule 3745-31-05.  
 Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3 gallons per day usage restriction in section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.

**B. Operational Restrictions**

1. The permittee shall not employ more than 3.0 gallons of coating, as applied, in any one day in this emissions unit.
2. The permittee shall employ polyester/paper filters to control particulate matter emissions during the operation of this emissions unit.

**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; and
  - c. the total volume, in gallons, of all of the coatings employed.

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.]

3. The permittee shall collect and record whether or not the polyester/paper filter systems were in service when the emissions unit was in operation.

**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 coating line employs more than the applicable maximum daily coating usage limit. 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 total OC emissions exceeded 15.2 lbs/day, and the actual OC emissions for each such month.
3. The permittee shall submit deviation (excursion) reports that identify all days when the emissions unit was in operation and the polyester/paper filter systems were not in service.
4. These deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1 and B.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

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

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = U \cdot P \cdot (1 - CE)$$

E = the particulate emission rate in pounds per hour

U = maximum coating usage rate in gallons per hour

P = particulate emissions factor rate for enamel paint(worst case) 5.5 PM (lbs/gallon)

CE = fractional control efficiency of the control equipment

Emission Limitation:

2.76 tpy of organic compounds

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines (see section A.2.b).

Emission Limitation:

2.4 tpy of particulate emissions

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines (see section A.2.c).

Emission Limitation:

15.2 lbs/day of OC

## Applicable Compliance Method:

Daily records shall be maintained of the OC content of each coating employed, the daily usage of each coating employed, and the calculated average daily OC 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.

## Operational Restriction:

3.0 gallons of coating(s) applied per day

## Applicable Compliance Method:

Daily records shall be maintained of the total volume, in gallons, of all of the coatings employed.

F. **Miscellaneous Requirements**

1. None