

Facility ID: 1677011077 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: 1677011077 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>
Miscellaneous metal parts coating line	OAC rule 3745-31-05 (PTI 16-1693)	See A.2.a and A.2.b below.
	OAC rule 3745-21-09	See A.2.c below.
	OAC rule 3745-17-11	See A.2.d below.
	OAC rule 3745-17-07	See A.2.e below.

2. Additional Terms and Conditions

- (a) The permittee shall limit hourly VOC emissions from this emissions unit to no more than 14.0 lbs/hr.

The maximum annual VOC emissions from this emissions unit shall not exceed 9.9 tons/yr, based upon a rolling, 12-month summation of the monthly emissions.

Visible particulate emissions from this emissions unit shall not exceed 1% opacity, as a 6-minute average.

This emissions unit shall be limited to the use of coatings with a daily volume-weighted average VOC content, of all coatings employed, of not greater than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

The permittee shall limit hourly particulate emissions from this emissions unit to no more than 0.551 lb/hr.

The limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall install and use exhaust fan filter elements to control particulates.
2. Neither prepaint preparation nor paint cleanup shall be done in the spray booth. The only prepaint preparation necessary shall be done in a separate and "de minimis" process, requiring no permits and using solvents containing no hazardous air pollutants (HAPS). Daily recordkeeping of VOC emissions for the prepaint preparation process, per OAC rule 3745-15-05 requirements, shall be used to continually demonstrate this process as being a "de minimis" emissions unit. As for paint cleanup, only the paint guns and hoses will need to be cleaned in a separate process, which qualifies for permit exemption pursuant to OAC rule 3745-31-03(A)(1)(w) covering solvent cold cleaners.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record daily the following information for the coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content, in pounds of VOC per gallon of coating, (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. 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. This calculation is not necessary if each and every coating formulation employed during a given day contains no more than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents;

- d. the total VOC emissions from all coatings employed, in pounds;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emissions from all coatings employed, in pounds per hour.
2. The permittee shall collect and record each calendar month the following for the coating line:
- a. from the daily records above, the monthly VOC emissions, in tons; and
 - b. the annual VOC emissions, based upon a rolling, 12-month summation of the monthly emissions, in tons.
- 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 an exceedance of the allowable daily volume-weighted average VOC content of all coatings employed of 3.5 lbs/gal, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director within 45 days following the exceedance.
 2. The permittee shall submit deviation (excursion) reports which identify each day during which the average hourly VOC emissions from all coatings employed exceeded the allowable average hourly VOC emissions rate of 14.0 lbs/hr.
 3. The permittee shall submit deviation (excursion) reports for each month during which VOC emissions from all coatings employed exceeded the maximum allowable VOC emissions of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A.2 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, as a daily volume-weighted average VOC content, for all coatings employed

Applicable Compliance Method:

Compliance with the above limit shall be demonstrated with the procedures covered under OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). USEPA Method 24 shall be used to determine the VOC contents for all coating formulas used with the above coating line. 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:

14.0 lbs/hr and 9.9 tons/yr of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitations based upon the recordkeeping requirements of these T&C's.
Emission Limitation:

0.551 lb/hr of particulates

Applicable Compliance Method:

$$E = P \times S \times (1-TE) \times (1-CE)$$
where,
E = particulates emission rate (lbs/hr);
P = maximum paint usage rate (gals/hr);
S = maximum solids content of paint (lbs/gal);
TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (TE = 0.70 for the airless gun method used at this facility); and
CE = control efficiency of the control equipment (CE = 0.90 for this facility).
Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

USEPA Method 9, 40 CFR Part 60, Appendix A
- F. Miscellaneous Requirements**
1. This permit allows the use of the coatings specified by the permittee in the application for PT1 16-1693. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level

concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on the coating usage rate, formulation data, and the design parameters of the emissions unit's exhaust system, as specified in the permit application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for various pollutants 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 Cellosolve Acetate (CAS 111-15-9) and Triethylamine (CAS 121-44-8), which were chosen because they have the lowest Time-Weighted Average (TWA) threshold levels of all pollutants listed in the application:

Pollutant: Cellosolve Acetate (CAS 111-15-9)

TWA (ug/m3): 27,000
Maximum Average Hourly Emission Rate (lbs/hr): 0.70
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33
MAGLC (ug/m3): 643

Pollutant: Triethylamine (CAS 121-44-8)

TWA (ug/m3): 4,100
Maximum Average Hourly Emission Rate (lbs/hr): 0.70
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33
MAGLC (ug/m3): 98

2. 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 from the appropriate Ohio EPA District Office or local air agency:
 - a. 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 TWA threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA 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. 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)]; and
 - d. any change in the composition of the coatings, or use of new coatings, that would result in an increase in emissions of any HAPS 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.
3. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the emissions unit.