

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 that does not employ VOC controls, and is used for the following applications: extreme performance, exterior steel pail/drum, or any other coating dried at less than 200 degrees F. Drying ovens must be less than 10 MMBtu/hr and be fired with only natural gas. A dry filtration system is used to control particulate emissions.	OAC rule 3745-31-05(A)(3) (PTI 16-1693)	<p>Volatile organic compound (VOC) emissions from coatings shall not exceed 14.0 pounds per hour, as a daily average, and 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Visible particulate emissions from this emissions unit shall not exceed 1% opacity, as a 6-minute average.</p> <p>The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1) and OAC rule 3745-17-11(B)(1).</p>
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pounds per hour from coatings.
	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. Neither prepaint preparation nor paint cleanup shall be done in the spray booth. The prepaint preparation 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, the paint guns and hoses shall 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 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 CVOC,2.
- 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 3.5 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 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.

- 4. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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

- 5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
- 7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. 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.
2. 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 3.5 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.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day the VOC emissions from coatings exceeded the hourly emission limit specified above.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC from coatings.
5. The quarterly deviation 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.1 of these terms and conditions shall be determined in accordance with the following methods:
 - Emissions Limitation:
daily volume-weighted average of 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents
 - Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.
 - Emissions Limitation:
VOC emissions shall not exceed 14.0 pounds per hour, as a daily average, from coatings
 - Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.
 - Emissions Limitation:
VOC emissions shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions, from coatings
 - Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.3.
 - Emission Limitation:
0.551 pound of particulate emissions per hour
 - Applicable Compliance Method:
To determine the worst case particulate emissions 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 = particulate emissions rate, in pounds per hour;

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:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 1% opacity, as a six-minute average.
 - 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. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 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.
 - Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.
 - US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. None